

EARLY SUGGESTED CHANGES TO THE DRAFT LONDON PLAN			MAYOR OF LONDON 2018	
Change ref no	Policy/para /table/map	Suggested change  red bold = new text; <del>red strikethrough</del> = deleted text	In response to	Reason

Foreword				
MSC.F.1	Foreword third paragraph	Throughout this evolution, London has seen waves of growth and our surroundings reflect these past chapters of rapid development and change. We now face another wave of growth, the likes of which we've not seen for a century. Our population is projected to increase by 70,000 every year, reaching 10. <b>58</b> million in 2041.		Factual correction and consistency within the Plan
MSC.F.2	Foreword seventh paragraph	Some of the very richest and very poorest people in the country live in London, with <b>healthy</b> life expectancy differing by up to 19 years between boroughs...		Factual correction and consistency within the Plan
Introducing the Plan				
MSC.0.1	Introduction Paragraph 0.0.3	0.0.3 The general objectives for the London Plan, and the process for drawing it up, altering it and replacing it, are set out in the Greater London Authority Act 1999 (as amended) and <b>the Town and</b>		Factual Update

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		<b>Country Planning (London Spatial Development Strategy) Regulations 2000.</b> <del>supporting detailed regulations.</del> The <b>London</b> Plan has been developed in line with these requirements.		
MSC.0.2	Introduction Paragraph 0.0.5	0.0.5 In developing the <del>is</del> <b>SDS-strategy</b> , in accordance with the legislation <sup>3</sup> and associated regulations, the Mayor has had regard to:		Clarification
MSC.0.3	Introduction Paragraph 0.0.6	0.0.6 In drawing up the new London Plan, the Mayor has also had regard to: <ul style="list-style-type: none"> <li>All relevant European Union <b>obligations of the UK</b> <del>legislation and policy instruments like the European Spatial Development Perspective</del> like the European Spatial Development Perspective</li> <li>The need to ensure consistency with national policies and international treaty obligations notified to the</li> </ul>		Clarification

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		<p>Mayor by Government, without seeking to repeat national policy</p> <ul style="list-style-type: none"> <li>The Mayor's other statutory obligations including the duty for the GLA to do all it reasonably can to prevent crime and disorder under the Crime and Disorder Act 1998, and the public-sector equality duty, as set out in Section 149 of the Equality Act 2010, covering race, disability, gender, age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment.</li> <li>the specific requirements of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000.</li> </ul>		
MSC.0.4	Introduction Paragraphs 0.0.7 and 0.0.8	0.0.7 The document brings together the geographical and locational aspects of the Mayor's other strategies, <b>to ensure</b>		Clarification

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		<p><b>consistency with those strategies,</b> including those dealing with:</p> <ul style="list-style-type: none"> <li>• Transport</li> <li>• Environment</li> <li>• Economic Development</li> <li>• Housing</li> <li>• Culture</li> <li>• Health and Health Inequalities.</li> </ul> <p><del>0.0.8 — The draft Plan has been developed alongside the Mayor's other statutory strategies to ensure consistency with those strategies.</del></p>		
MSC.0.5	Introduction Paragraph 0.0.9	0.0.9 The London Plan is legally part of each of London's Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of <b>Greater</b> London. Planning applications should be determined in accordance with		Clarification

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		<p>it, unless there are sound planning reasons (other material considerations) which indicate otherwise. <del>The Plan provides the strategic, London-wide policy context for borough local development plan documents;</del> <b>All all local Ddevelopment Pplan Ddocuments</b> and Neighbourhood Plans have to be 'in general conformity' with the London Plan.</p>		
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MSC.0.6	Introduction Paragraph 0.0.10	0.0.10 Planning in London is the joint responsibility of the Mayor of London and the 32 London boroughs, the City of London Corporation and the Mayoral Development Corporations (MDCs), (of which there are currently two: the London Legacy Development Corporation and the Old Oak Park Royal Development Corporation) <b>along with neighbourhood forums designated by London's local planning authorities.</b> When the <b>London</b> Plan refers to 'boroughs' it is referring to the 32 London boroughs, the City of London and the MDCs. This approach has been taken to make the document more readable.	Community Groups (Just Space, Fortune Green & West Hampstead NDF, Redington Frogna Neighbourhood Forum, Mill Hill Neighbourhood Forum, Highgate Society, Neighbourhood Planners, Old Bermondsey Village Neighbourhood Forum), Oneill Homer, individuals	Clarification
MSC.0.7	Introduction Paragraph 0.0.11	0.0.11 <del>This</del> <b>The London</b> Plan must be read as a whole. The placement of the topic chapters and the policies within the chapters is no reflection on their		Readability

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		importance or weight – it does not represent a hierarchy.		
MSC.0.8	Introduction Paragraph 0.0.12	0.0.12 The <b>London</b> Plan sets out policies and supporting text (also known as reasoned justification). These take account of: <ul style="list-style-type: none"> <li>the legal requirements related to the development of the <b>London</b> Plan (including those discussed above) and the various issues that European and national legislation requires to be considered</li> <li>other requirements of <del>planning law</del> <b>and</b> Government planning policy and guidance (without seeking to repeat these)</li> </ul>		Clarification and readability
MSC.0.9	Introduction Paragraph 0.0.13	0.0.13 The <b>published London final</b> Plan will also take account of the comments received during the consultation process and the recommendations of the panel		Readability

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		that conduct the Examination in Public (see Next Steps).		
MSC.0.10	Introduction Paragraphs 0.0.14 and 0.0.14A  Footnote 4	0.014 This London Plan runs from 2019 to 2041. This date has been chosen to provide a longer-term view of London's development to inform decision making. However, some of the more detailed elements of the Plan, such as the <b>annual</b> housing targets are set <del>only</del> for <b>only</b> the first ten years of the Plan. This reflects <del>the dynamic nature of London's land market and means that there will need to be a review of the housing targets before 2029.</del> <b>the capacity of land suitable for residential development and intensification identified in the 2017 Strategic Housing Land Availability Assessment (SHLAA), which due to the dynamic nature of London's land market does not attempt to robustly identify</b>	MDCLG	Clarification and factual update



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		<p><b>capacity beyond 2029.</b> <del>Other elements of the Plan will need to be updated over time through Supplementary Planning Guidance as part of the ‘plan, monitor, manage’ approach</del></p> <p><b>0.0.14A The Government recently published a new methodology for calculating housing need. This new methodology was published too late to be incorporated into the evidence-base for the new London Plan, which instead relies on the 2017 Strategic Housing Market Assessment (SHMA) for its evidence of housing needs. The 2017 SHMA uses an established methodology, that takes full account of the diversity of London’s housing needs and has been found sound at previous Examinations.</b></p>		
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		<del>Footnote 4 The draft Plan is underpinned by housing and economic projections. These projections are based on past trends. Monitoring this sort of information and the implementation of the Plan identifies when policies may need to be reviewed and changed</del>		
MSC.0.11	Introduction Paragraph 0.0.15	0.0.15 To help the reader navigate through the <b>London</b> Plan, paragraphs include key words in bold.		Readability
MSC.0.12	Introduction Paragraph 0.0.17	0.0.17 This is a new <b>London</b> Plan (also known as a Replacement Plan). This means it is not an alteration or update to previous <b>London</b> Plans. This <b>new London</b> Plan, <b>once published</b> will be the third London Plan, the previous ones being the 2004 <b>London</b> Plan produced by former Mayor of London Ken Livingstone and the 2011 <b>London</b> Plan produced by former Mayor of London Boris Johnson. All of the other iterations		Readability

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		of the London Plan from 2004-2016 have been alterations. Once <b>published</b> <del>adopted</del> this <b>London</b> Plan will replace all previous versions.		
MSC.0.13	Introduction Paragraph 0.0.18	0.0.18 This <b>London</b> Plan is different to those that have gone before it. It is more ambitious and focused than any previous <b>London</b> Plans. The concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable – underpins the <b>London</b> Plan and ensures that it is focused on sustainable development.		Readability
MSC.0.14	Introduction Paragraph 0.0.19	0.0.19 As well as taking account of the relevant legislation, <del>regulations</del> and Government policy, this <b>London</b> Plan also seeks to deliver the Mayor's manifesto commitments and - alongside the Mayor's other strategies – set the framework for how these commitments		Clarification and Readability

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		can be achieved in spatial development terms.		
MSC.0.15	Introduction Paragraph 0.0.20	0.0.20 The policies in the <b>new London</b> Plan have been developed over a number of months and are supported by a proportionate evidence base <sup>5</sup> . <del>In their development, the Mayor has had regard to the need to ensure consistency with national policies, but does not seek to repeat them. Instead</del> <b>The new</b> London Plan seeks to develop an approach tailored for London <b>to reflect the particular circumstances in the capital</b> , and <b>it will</b> act as the key document shaping planning decisions across <b>Greater London the capital</b> . <del>On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment reflects the particular</del>	GLA Conservative Group, Alliance, Affinity, MDCLG, London Boroughs, London First, Silvertown Homes, Chessington World of Adventures Resort, Aitch Group, Mill Hill Neighbourhood Forum, Camden Conservatives, Chessington World of Adventures Resort, Roxhill Developments Ltd	Clarification

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		<del>circumstances of London. The scale of the Mayor's election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments.</del>		
MSC.0.16	Introduction Paragraph 0.0.21	0.0.21 <b>Once published, the London Plan is part of the Development Plan. The Policies have been drafted in a way that allows London to implement this ambitious London Plan as soon as possible. There is no requirement for the policies to be repeated at the local level. However, in some instances a local approach is required within the context of the overall policy. The new London Plan clearly sets out where this is the case. In addition, the new London Plan does not preclude boroughs from bringing forward policies in their Development Plan Documents to achieve the aims of the</b>	LB Lambeth	Clarification

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		<p><b>London Plan in a way that takes into account local circumstances and evidence, where they consider it appropriate to do so.</b> <del>The drafting of the Plan aims to ensure that London is ready to implement this ambitious Plan as soon as possible and that the policies do not take years to implement due to the time it can take to update local development plan documents. As the London Plan is part of every borough's development plan, there is no requirement for the policies to be repeated at the local level before they can be implemented. However, in some instances a local approach is required within the context of the overall policy. The Plan clearly sets out where this is the case.</del></p>		
MSC.0.17	Introduction	0.0.22 This <b>new London</b> Plan provides the framework to address the key	Individuals	Clarification

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	Paragraphs 0.0.22 and 0.0.23	<p>planning issues facing London; <del>This</del> allow<b>ings</b> boroughs to spend time and resources on those issues that have a distinctly local dimension and on measures that will help deliver the growth London needs. This includes area-based frameworks, action plans and Supplementary Planning Documents, site allocations, brownfield registers and design codes, <b>as well as supporting neighbourhood planning.</b></p> <p>0.0.23 It is crucial that all those involved in planning and development in London understand how London's <del>two</del><b>three</b>-tier planning system <b>works (including regional, local and neighbourhood planning)</b> and do not seek to duplicate policy or evidence unnecessarily.</p>	Just Space	
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MSC.0.18	Introduction Paragraphs 0.0.27	0.0.27.....The IIA approach addresses the Mayor's legal duties to carry out a comprehensive assessment of the Plan and its proposed policies with one integrated process.		Readability
MSC.0.19	Introduction Paragraphs 0.0.33	0.0.33 The EiP is a hearing based around a detailed discussion of selected subjects covered by the <b>proposed</b> new <del>draft</del> London Plan. It is likely to be held in the autumn of 2018. After it is completed, the Panel will produce a report recommending changes to the <b>London</b> Plan for the Mayor's consideration, which the Mayor can decide to accept or reject.		Readability
<b>Chapter 1 Planning London's Future (Good Growth Policies)</b>				
MSC.1.1	Paragraph 1.0.1	1.0.1 London's growth and development is shaped by the decisions that are made every day by planners, planning applicants, <b>and</b> decision-	Just Space	Clarification



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		makers <b>and Londoners</b> across the city.		
MSC.1.2	Paragraph 1.0.3A	<i>Insert new paragraph 1.0.3A</i> <b>1.0.3A</b> By setting a new level of ambition for the people who make all of London's planning decisions, this London Plan will <b>help realise the Mayor's vision of creating</b> <del>create</del> a <del>better</del> city for all Londoners, <b>where no one is left behind</b>	Individuals	Clarification
MSC.1.3	GG1 Paragraph 1.1.1	1.1.1 London is made up of diverse communities. Its neighbourhoods, schools, workplaces, parks, community centres and all the other times and places Londoners come together give the city its cultural character and create its future. Planning for Good Growth means planning <del>for</del> <b>with</b> these communities – both existing and new - <del>helping them to flourish and</del> making new		Readability and consistency with other GLA strategies

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		connections <del>between them, and eroding inequalities.</del>		
MSC.1.4	GG1 Paragraph 1.1.2	<p>1.1.2 40 per cent of Londoners are from Black, Asian and Minority Ethnic (BAME) backgrounds, and the city is home to a million EU citizens, <del>and</del> 1.2 million disabled people, <b>and up to 900,000 people who identify as LGBT+. Over a fifth of London's population is under 16, but over the coming decades the number of Londoners aged 65 or over is project to increase by 90 per cent. The success of London's communities relies upon t</b> This diversity <b>is essential to the success of London's communities. To keep them strong, To maintain this</b> London must remain open, <del>and</del> inclusive, <b>and</b> allowing everyone to share in and contribute towards the city's success.</p>	Age UK London and UCL urban laboratory	Factual update and clarification

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MSC.1.5	GG1 Paragraph 1.1.3	1.1.3 <del>This will not be easy.</del> London is one of the richest cities in the world, but it is also home to some of the poorest communities in the country,		Readability
MSC.1.6	GG1 Paragraph 1.1.4	1.1.4 Delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspace in accessible locations, <b>built forms that work with local heritage and identity,</b> and social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.	Historic England	Clarification
MSC.1.7	GG1 Paragraph 1.1.5	1.1.5 Early engagement with local people leads to better planning proposals, with Neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their		Readability and clarification

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		areas. Taking advantage of the knowledge and experience of local people will help to shape London's growth, creating a thriving city that works better for <del>the full diversity of its inhabitants</del> . <b>all Londoners.</b>		
MSC.1.8	GG1	<b>Good growth is inclusive growth.</b> To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:	Individual and Atkins	Clarification
MSC.1.9	GG1 AA	<i>Insert new clause AA</i> <b>AA seek to ensure changes to the physical environment achieve an overall positive contribution to London.</b>	InLinkUK	Clarification
MSC.1.10	GG1 B	B provide access to good quality <b>community spaces</b> , services and amenities <b>and infrastructure</b> that accommodate, encourage and strengthen communities, increasing	Selby Trust and community groups	Clarification

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		active participation and social integration, and addressing social isolation.		
MSC.1.11	GG1 BA	<i>Previous clause A is now BA</i> <b>A BA</b> seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, <b>more inclusive</b> and more equal city.	Access Association	Clarification
MSC.1.12	GG1 C	C ensure that streets and public spaces are <b>consistently</b> planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, <b>which encourage</b> <del>and</del> community <b>buy-in ownership</b> , and where communities can develop and <del>flourish</del> <b>thrive</b> .	Access Association and Crest Nicholson	Clarification and readability

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MSC.1.13	GG1 D	D promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for <del>face-to-face contact and social interaction</del> <b>building relationships</b> during the daytime, evening and night time.		Clarification
MSC.1.14	GG1 E	E ensure that new buildings and the spaces they create are designed to reinforce or enhance the <b>identity</b> , legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.	Historic England	Clarification
MSC.1.15	GG1 F	F support <b>and promote</b> the creation of a London where all Londoners, including <b>children and young people</b> , older people, disabled people, and people with young children, <b>as well as people with</b>	Individual and UCL urban laboratories individuals	Clarification

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		<b>other protected characteristics</b> , can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.		
MSC.1.16	GG1 FA	<i>Insert new clause FA</i> <b>FA support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers and challenges and inequalities.</b>		Consistency with other GLA strategies

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MSC.1.17	GG2 Paragraph 1.2.3	1.2.3 The benefits of this approach are wide-ranging, going well beyond the simple ability to provide more homes and jobs. High-density, mixed-use places support the clustering effect of businesses known as ‘agglomeration’, maximising job opportunities. They provide a critical mass of people to support the investment required to build the schools, health services, <del>and</del> public transport <b>and other</b> infrastructure that neighbourhoods need to work. They are places where local amenities are within walking and cycling distance, and public transport options are available for longer trips, supporting good health, allowing strong communities to develop, and boosting the success of local businesses.	London Forum of Amenity and Civic Societies	Clarification
MSC.1.18	GG2	1.2.6 As London develops, the Mayor’s Good Growth by Design programme -		Clarification



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	Paragraph 1.2.6	which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering <b>more than</b> 50 per cent green cover across London, will be important to help London become a National Park City.		
MSC.1.19	GG2 Paragraph 1.2.7	1.2.7 London's distinctive character and heritage is why many people want to come to the city. <b>London's heritage holds local and strategic significance for the city and for Londoners, and will be conserved and enhanced.</b> As new developments are designed, the special features that Londoners value about a place, such as cultural, historic	Historic England and London Forum of Amenity and Civic Societies	Clarification

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		or natural elements, <del>can</del> <b>should</b> be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places.		
MSC.1.20	GG2	To create <b>successful high-density</b> , mixed-use places that make the best use of land, those involved in planning and development must:	LB Islington, LB Harrow  LB Hillingdon and London Forum of Amenity & Civic Societies	Clarification
MSC.1.21	GG2 A	A <b>enable</b> <del>prioritise</del> the development of <b>brownfield land, prioritising</b> Opportunity Areas, <del>brownfield land,</del> surplus public sector land, <del>and</del> sites which are well-connected by existing or planned Tube and rail stations, <b>and</b> sites within and on the edge of town centres, <del>and</del> <b>as well as utilising</b> small sites.	LB Brent	Clarification
MSC.1.22	GG2 B	B proactively explore the potential to intensify the use of land, including public land, to support additional homes and	LB Lewisham and London NHS CCG	Clarification

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		workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling to <b>other infrastructure and services</b> , applying a design-led approach.		
MSC.1.23	GG2 C	C understand what is valued about existing places and use this as a catalyst for growth, <b>renewal</b> , and place-making, strengthening London's distinct and varied character.	Friends of the Earth	Consistency within the Plan
MSC.1.24	GG2 D	D protect <b>and enhance</b> London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, <b>including aiming to secure net biodiversity gains where possible.</b>	LB Hillingdon and Royal Society for the Protection of Birds	Clarification and consistency within the Plan

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MSC.1.25	GG3 Paragraph 1.3.1	1.3.1 The <b>mental and physical</b> health of Londoners is, to a large extent, determined by the environment in which they live.	LB Southwark, London Healthier Places Network	Clarification
MSC.1.26	GG3 Paragraph 1.3.2	1.3.2 <b>As set out in the Mayor's draft Health Inequalities Strategy,</b> <del>the</del> the scale of London's health inequalities is great, and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London's ongoing growth provides an opportunity to reduce these inequalities., <del>and d</del> Delivering Good Growth will involve prioritising health in all London's planning decisions, <b>including through design that supports health outcomes, and the assessment and mitigation of any potential adverse impacts of</b>	LB Camden	Consistency with other GLA strategies

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		<b>development proposals on health and health inequality.</b>		
MSC.1.27	GG3 Paragraph 1.3.3	1.3.3 ....Access to green and open spaces, including waterways, can improve health, but access <b>and quality</b> varies widely across the city...	London Wildlife Trust	Clarification
MSC.1.28	GG3 B	B promote more active and healthy <b>lives lifestyles</b> for all Londoners and enable them to make healthy choices.	My Fair London	Clarification
MSC.1.29	GG3 D	D assess the potential impacts of development proposals <b>and development plans</b> on the <b>mental and physical</b> health and wellbeing of communities, in order to mitigate any potential negative impacts, <b>maximise potential positive impacts</b> , and help reduce health inequalities, for example through the use of Health Impact Assessments.	Public Health England London NHS CCG London Assembly	Clarification

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MSC.1.30	GG3 DA	<i>Insert new clause DA</i> <b>DA plan for appropriate health and care infrastructure to address the needs of London's changing and growing population.</b>	Office of London CCGs, LB Lewisham	Clarification
MSC.1.31	GG3 DB	<i>Insert new clause DB</i> <b>DB seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution.</b>	Friends of the Earth	Clarification
MSC.1.32	GG3 E	E plan for improved access to green spaces, <b>improvement to their quality,</b> <del>and</del> the provision of new green infrastructure, <b>and spaces for play, recreation and sports.</b>	London Volleyball, Sports England, LB Harrow, LB Richmond, LB Wandsworth	Clarification
MSC.1.33	GG4 Paragraph 1.4.2	1.4.2 The state of London's housing market has implications for the makeup and diversity of the city. Affordable housing is central to allowing Londoners of all	Barton Wilmore London Chamber of Commerce	Clarification

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		means and backgrounds to play their part in community life. Providing a range of high quality, well-designed, accessible homes is important to delivering Good Growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live. <b>The failure to provide sufficient numbers of new homes to meet London's need for affordable, market and specialist housing has given rise to a range of negative social, economic and environmental consequences, including: worsening housing affordability issues, overcrowding, reduced labour market mobility, staff retention issues and longer commuting patterns.</b>		
MSC.1.34	GG4 Paragraph 1.4.3	1.4.3 The lack of supply of the homes that Londoners need has played a significant role in London's housing crisis. The 2017	Numerous community/ campaign groups.	Clarification

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		London Strategic Housing Market Assessment has identified a significant overall need for housing, and for affordable housing in particular. London needs 66,000 new homes each year, for at least twenty years and evidence suggests that 43,000 of them should be genuinely affordable if the needs of Londoners are to be met. This supports the Mayor's strategic target of 50 per cent of all new homes being genuinely affordable, <b>which is based on viability evidence</b> . 270,000 homes are in the planning pipeline, but delivery is not keeping pace.		
MSC.1.35	GG4 Paragraph 1.4.5	1.4.5 To meet the growing need, London must seek to deliver new homes through <b>a wide range of development options every available means</b> . Reusing large brownfield sites will remain crucial, although vacant plots are now scarce,	Chiswick Protection Group	Clarification



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		and the scale and complexity of large former industrial sites makes delivery slow. Small sites in a range of locations can be developed more quickly, and enable smaller builders to enter the market. Building more housing as part of the development of town centres will also be important, providing homes in well-connected places that will help to sustain local communities.		
MSC.1.36	GG4 Paragraph 1.4.5A	<i>Insert new paragraph 1.5.A</i> <b>1.4.5A The homebuilding industry itself also needs greater diversity to reduce our reliance on a small number of large private developers. New and innovative approaches to development, including Build to Rent, community-led housing, and self- and custom-build, will all need to play a role, and more of our new homes will need to be built using precision-</b>	London Boroughs	Clarification

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		<b>manufacturing. Alongside this, there will need to be a greater emphasis on the role councils and housing associations play in building genuinely affordable homes.</b>		
MSC.1.37	GG4 Paragraph 1.4.6	1.4.6 There are a range of other measures that <b>have an</b> impact on the availability of homes. <b>For example, E</b> existing homes must not be left empty, and have the potential to be brought back into use as affordable housing <del>The Build to Rent model can deliver homes for rent quickly,</del> <b>and B</b> oroughs should use all the tools at their disposal to ensure that homes are actually built after planning permissions are granted.	London Boroughs	Readability
MSC.1.38	GG4 Paragraph 1.4.7	1.4.7 ... <del>Together</del> <b>Along</b> with the London Housing Strategy, this London Plan establishes the framework...		Readability

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MSC.1.39	GG4 D	D identify and allocate a range of sites, <del>including small sites,</del> to deliver housing locally, supporting skilled precision-manufacturing...	LB Greenwich	Clarification
MSC.1.40	GG4 Paragraph 1.4.9	1.4.9 ...The people who these businesses employ need strong communities, <b>good public transport connections</b> , pleasant environments that promote good health, <b>access to shops and local services</b> , and good quality, affordable homes in places they want to live...	London Forum of Amenity and Civic Societies	Clarification
MSC.1.41	GG4 Paragraph 1.4.10	1.4.10 ...growth in town centres across London will be equally important, <b>alongside</b> supporting local regeneration, <b>investment in Opportunity Areas and enabling access to a wide range of jobs</b> . Reasonably-priced, good quality employment space will be needed across London to make this happen.	LB Kingston The Putney Society Centre for Accessible Environments	Clarification

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MSC.1.42	GG5 G	G <del>maximise</del> <b>make the fullest use of</b> London's existing and future public transport, walking and cycling network...	LB Newham	Clarification
MSC.1.43	GG5 Paragraph 1.5.3	1.5.3 ...developments must plan for a more integrated approach to water management, while <del>protecting against</del> <b>minimising</b> flood risk.	Environment Agency London Wildlife Trust	Clarification
MSC.1.44	GG6 B	B ...making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, <b>while mitigating against</b> and avoiding contributing to the urban heat island effect.	Trees and Design Action Group	Clarification
MSC.1.45	GG6 D	D take an integrated <b>and smart</b> approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.	Levitt Bernstein LLP	Clarification
<b>Chapter 2 Spatial Development Patterns</b>				

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MSC.2.1	Figure 2.1	<i>Map to be amended</i> <b>Figure 2.1 – The Key Diagram</b>		Factual
MSC.2.2	SD1 A 1 d	To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:  1)..... d) are prepared in <b>an open and</b> timely manner		Consistency
MSC.2.3	SD 1 B 3	Boroughs, through their Development Plans and decisions should:  3) plan for and provide the necessary social and other infrastructure to sustain growth <b>and create mixed and inclusive communities</b> , working with <b>community and</b> infrastructure providers where necessary.		Consistency

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MSC.2.4	SD1 B 3A	B Boroughs, through Development Plans and decisions, should: 3A) <b>recognise the role of heritage in place-making</b>	Historic England	Clarification
MSC.2.5	SD1 B 4	B Boroughs, through Development Plans and decisions, should: <del>4) recognise that larger areas can define their own character and density</del> <b>establish the capacity for growth in the Opportunity Areas in accordance with Policy D2 Delivering good design and Policy D6 Optimising density</b>	Historic England	Clarification
MSC.2.6	SD1 Paragraph 2.1.1	2.1.1 <b>Opportunity Areas</b> are <b>identified as</b> <del>the capital's most</del> significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport	LB Haringey	Clarification

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		connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two.		
MSC.2.7	SD1 Paragraph 2.1.3	2.1.3 The Mayor will provide the <b>support and leadership</b> to ensure Opportunity Areas deliver their growth potential <b>for Londoners</b> . He will promote and champion the areas as key locations for investment, and will intervene where required so that an ambitious, imaginative and inclusive approach is taken to accelerate and realise their growth and development..... <b>This approach should include understanding the existing character and context of an area, in accordance with Policy D2.</b>	Historic England	Clarification

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MSC.2.8	SD1 Paragraph 2.1.6	2.1.6 ...In order to meet London's needs and ensure sustainable development, all stakeholders should seek to proactively promote and enable growth in these areas in line with the policies in this Plan...		Factual correction
MSC.2.9	SD1 Paragraph 2.1.7	2.1.7 The key growth corridors within London are set out below. <u>Policy SD2 Collaboration in the Wider South East</u> and Figure 2.15 include Strategic Infrastructure Priorities that link into the wider city region. <b>The Mayor will work with authorities outside London on the cross-boundary implications of Opportunity Areas.</b>	SESL	Clarification
MSC.2.10	SD1 Paragraph 2.1.10	2.1.10 The Mayor's Transport Strategy seeks to ensure that <del>dedicated</del> public transport and walking and cycling provision are at the heart of planning for Opportunity Areas. It sets out that the		Readability



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		Mayor will support growth in Opportunity Areas through transport investment and planning, and <b>commits to the setting of</b> <del>sets</del> ambitious mode share targets.		
MSC.2.11	SD1 Paragraph 2.1.11	2.1.11 ..... The development value in these areas can, in some cases, also contribute to the funding of <del>the</del> <b>schemes</b> . In order to support these priorities, <del>this</del> <b>Plan</b> sets out further guidance on <del>these</del> <b>specific</b> Opportunity Areas below, grouped by growth corridor.....		Readability
MSC.2.12	SD1 Paragraph 2.1.11	2.1.11.....Where development proposals are emerging and transport investment is not yet fully secured, delivery of the long--term capacity <b>for homes and jobs</b> will need to be phased in a way that maximises the benefits <del>from</del> <b>of</b> major infrastructure and services		Readability

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		investment whilst avoiding any unacceptable effects on existing infrastructure before <del>the new infrastructure is available.</del> <b>schemes are delivered.</b>		
MSC.2.13	Table 2.1	<i>Insert new table</i>  <b>Table 2.1 - Opportunity Area Indicative guidelines for new homes and jobs</b>  <i>See Extract</i>	LB Islington, LB Lambeth, LB Hackney, LB Wandsworth, Just Space, HB Reavis Ltd	Readability
MSC.2.14	SD1 Paragraph 2.1.16	2.1.16 ..... The proposal for <del>an extension of the</del> <b>a Bakerloo Line Extension station</b> at New Cross Gate will enable delivery of these developments and improvements. The area has an established commercial centre capable of supporting commercial expansion and diversification, building on the existing assets such as Goldsmiths College, University of London <del>and the emerging</del>	LB Lewisham	Readability

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		<b>areas</b> of artistic and cultural character. Development should improve north-south connections and pedestrian and cycling movement across <b>and along</b> the traffic-dominated New Cross Road (A2) as well as connectivity between New Cross Gate and surrounding communities.		
MSC.2.15	SD1 Paragraph 2.1.18	2.1.18..... To support the area, approximately 2,700 new homes can be accommodated in the heart of the town centre. <b>The realignment of the A205 will assist in the transformation of the town centre.</b>	LB Lewisham	Readability
MSC.2.16	SD1 Paragraph 2.1.22	2.1.22 In particular it identified four areas where there is scope for significant change:  .....  <ul style="list-style-type: none"> <li>Norbiton, London Road and Cambridge <b>Road</b> Estate</li> </ul>	RB Kingston	Clarification

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MSC.2.17	SD1 Paragraph 2.1.23	2.1.23 ... It should also explore how the use of industrial land can be intensified to make more efficient use of land. <b>Kingston town centre, with its ancient market is rich in heritage and forms an important part of the setting of Hampton Court Palace, its gardens, the Thames and surrounding Royal Parks.</b>	Historic England, RB of Kingston, Kingston First	Clarification
MSC.2.18	SD1 Paragraph 2.1.24	2.1.14 In the longer term, and in line with the opening of Crossrail 2 in 2033, there may be potential to accommodate growth in the following areas: <ul style="list-style-type: none"> <li>Berrylands <b>Station</b> and Hogsmill Valley</li> </ul>	RB Kingston	Clarification
MSC.2.19	SD1 Paragraph 2.1.26	2.1.26 Clapham Junction is Europe's busiest <b>rail</b> interchange station, <del>and a designated Major town centre.</del> <b>serving key commuter routes from West London and Southern England, and is</b>	Network Rail, Innova	Clarification

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		<p><b>identified as one of London's four strategic interchanges expected to accommodate rising levels of demand. However, the station is already operating at capacity in terms of rail services and passenger numbers and suffers from over-crowding at peak times. Reconfiguration of the existing rail infrastructure and the station is needed to increase capacity and substantially improve passengers' public transport experience.</b> The proposal for a Crossrail 2 station represents a unique opportunity to make more efficient use of land surrounding the station for residential and commercial development, including new offices <b>as part of the designated Major town centre.</b> <del>The station suffers from over-crowding at peak times, and requires significant investment to allow it to</del></p>		
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		<del>accommodate future growth in passenger numbers....</del>		
MSC.2.20	SD1 Paragraph 2.1.33	2.1.33.... It should also set out how site assembly and provision of better links with the town centre <b>and surrounding areas including Alexandra Palace and Alexandra</b> Park hold the key to comprehensive development.	LB Haringey	Clarification
MSC.2.21	SD1 Paragraph 2.1.49	2.1.49 The Planning Framework should also set out how to manage the opportunities for mixed-use development at Canning Town/West Ham, and Thameside West where there is or will be excellent public transport connectivity. <b>Silo D is a heritage asset at risk which provides opportunities for heritage and cultural-led regeneration.</b>	Historic England	Clarification
MSC.2.22	SD1 Paragraph 2.1.54	2.1.54 ...The Planning Framework should ensure that there is no net loss of industrial floorspace capacity, and that	Bexley	Factual correction

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		industrial uses are retained and intensified, and form part of the mix in redevelopment proposals. <b>Belvedere is recognised as having potential as a future District centre.</b>		
MSC.2.23	SD1 Paragraph 2.1.57	2.1.57 ..... A Local Plan has been published which recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners. <b>Positive masterplanning will be used to create an attractive new town centre with distinctive character.</b>	Historic England	Clarification
MSC.2.24	SD1 Paragraph 2.1.60	2.1.60 The Elizabeth Line will open in 2019 and transform connectivity along the route. It is already leading to increased development in central London and has	London Assembly Planning Committee	Clarification

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		the potential to bring forward growth and development from Stratford eastwards. <b>This includes the area of the London Legacy Development Corporation, which continues to secure the legacy of the 2012 Olympic and Paralympic Games.</b>		
MSC.2.25	SD1 Paragraph 2.1.64A	<i>Insert new paragraph 2.1.64A</i>  <b>2.1.64A The Great West Corridor is one of London's key approaches and presents unique opportunities for place-making. It inspired high-quality Art Deco architecture in the 1930s, creating a distinctive local character. The route is surrounded by some of London's most significant historic landscapes including the River Thames, Syon Park, Gunnersbury Park, Osterley Park and The Royal Botanic Gardens Kew World Heritage Site. Masterplanning in the</b>	Historic England	Clarification



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		<b>corridor should carefully consider these natural and historic assets, utilising the latest modelling techniques. The opportunities to integrate and draw inspiration from the area's heritage should be fully explored.</b>		
MSC.2.26	Figure 2.11	<i>Map to be amended</i> <b>Figure 2.11 - Central London</b>		Factual
MSC.2.27	Figure 2.12	<b>Trams Triangle</b>		Factual correction
MSC.2.28	SD2 B	B To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE partners to ensure that plan-making is, as far as possible, informed by <b>up-to-date</b> , consistent technical evidence <b>and monitoring</b> .	Barton Wilmore for developer consortium, Surrey and other county councils	Clarification

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MSC.2.29	SD2 E	E ...the need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality, <b>biodiversity</b> and <b>green infrastructure</b> ), and waste management, ( <del>including and</del> the promotion of Circular Economies); wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.	Environment Agency, Natural England, Many environmental organisations, Kent County Council, Bucks Districts and London Waste and Recycling Partnership	Clarification
MSC.2.30	SD2 Paragraph 2.2.1	2.2.1 London is not an island. There are 130 authorities in the WSE outside London.		Factual
MSC.2.31	SD2 Paragraph 2.2.5	2.2.5 .....Opportunities to collaborate should be considered where <b>mutual benefits</b> can be achieved. <b>The scope of these opportunities may vary depending on circumstances including proximity to London.</b> The promotion of good links	Authorities outside London	Clarifications

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		to/from potential employment locations outside London by the Mayor to help realise corresponding employment opportunities within and outside London is an example of <del>such</del> <b>how</b> mutual benefits <b>can be achieved. The Golden Triangle (life science sector collaboration with Oxford and Cambridge) and the Thames Estuary Production Corridor (delivering large-scale cultural infrastructure) are good examples of collaboration that is already underway.</b>		
MSC.2.32	SD2 Paragraph 2.2.6	2.2.6 The <b>non-statutory strategic structure for cooperation that is in place</b> complements the GLA Act requirement for the spatial development strategy to address matters of strategic importance to Greater London (GLA Act, VIII, S.334 (5)) and the <b>Mayor's statutory Duties to Inform and Consult</b> (GLA Act, VIII,		Clarification

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		S.335 'with adjoining counties and districts', S.339 'authorities outside London', S.348 'authorities in the vicinity of London').		
MSC.2.33	SD2 Paragraph 2.2.7 Footnote 8.	<p>2.2.7 ..... In addition, Planning Practice Guidance states that 'cooperation between the Mayor, boroughs and local planning authorities bordering London will be vital to ensure that important strategic issues, such as housing delivery and economic growth, are planned effectively'. <b>The Mayor will share his responses to Local Plans outside the capital with interested London boroughs.</b></p> <p><i>Amend footnote 8 as follows:</i></p> <p>NPPG – Paragraph: 007 <del>Reference ID: 9-007-20140306</del> <b>'Duty to Cooperate' (DCLG, 6 March 2014)</b></p>	Developers, London Forum of Amenity and Civic Societies	Clarification

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		<a href="https://www.gov.uk/guidance/duty-to-cooperate">https://www.gov.uk/guidance/duty-to-cooperate</a>		
MSC.2.34	SD2 Paragraph 2.2.8	2.2.8.... However, locally- <b>specific cross-border matters</b> between individual London boroughs and authorities beyond London <del>may</del> <b>should</b> be addressed most effectively by the relevant local authorities on the basis of their Duties to Cooperate.	London Forum of Amenity and Civic Societies	Clarification
MSC.2.35	SD3 A	A The Mayor will work <del>with relevant WSE partners</del> <b>strategic and local authorities</b> , Government and other <del>agencies</del> <b>interested partners</b> to realise the growth potential of the <del>wider city region</del> <b>WSE</b> and beyond through investment in strategic infrastructure to support housing and business development <b>in particular</b> in growth locations to meet need and secure	Barton Wilmore on behalf of consortium of developers	Clarification and readability

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		mutual benefits for London and relevant partners.		
MSC.2.36	SD3 B	B The Mayor supports recognition of these growth locations with links to London in relevant Local Plans <b>outside London</b> .		Factual
MSC.2.37	SD3 Paragraph 2.3.1	2.3.1 This Plan aims to accommodate <del>all</del> <b>the vast majority</b> of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces.		Clarification
MSC.2.38	SD3 Paragraph 2.3.3	2.3.3 The GLA's new <b>Strategic Housing Market Assessment</b> shows that London has a need for approximately 66,000 additional homes a year. The <b>new</b> Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this.		Clarification

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MSC.2.39	SD3 Paragraph 2.3.4	2.3.4 <del>Despite</del> <b>Although</b> this Plan <b>is</b> seeking to accommodate the vast majority of London's future growth <b>within its boundary</b> , <del>some migration will continue</del> <b>Given</b> the pressure for growth in both London and the WSE, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to <b>also</b> plan for longer-term contingencies. Therefore, the Mayor is interested in <b>working with willing partners</b> beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital.	Authorities outside London	Clarification and readability
MSC.2.40	SD3 Paragraph 2.3.5 Footnote 9	2.3.5... Recognising that investment in public transport can often bring significant benefits to wider areas, such partnerships could focus on optimising rail capacity between London, the wider	Authorities outside London	Clarification

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		<p>region and beyond. <b>Crossrail 2 and HS2</b> are examples with such potential. Another area of focus could be proposals for new/garden settlements with good links to London. Government has already indicated support for a similar approach.</p> <p><i>Amend footnote 9 as follows:</i>            Locally-led Garden Villages, Towns and Cities (DCLG, March 2016)  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf</a></p>		
MSC.2.41	SD3 Paragraph 2.3.6	<del>2.3.6 Moved</del>	Authorities outside London	Clarification
MSC.2.42	SD3 Paragraph 2.3.7	2.3.7...The Mayor will work with key willing partners, including local authorities,		Clarification



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		Local Enterprise Partnerships, <b>Sub-national Transport Bodies</b> , the National Infrastructure Commission and Government, to explore strategic growth opportunities where planning and delivery of strategic infrastructure (in particular public transport) improvements can unlock development that supports the wider city region.		
MSC.2.43	SD3 Paragraph 2.3.8	2.3.8 It will be important to ensure that growth in the WSE contributes to local vibrancy and economic activity at all times of the day and week, and that the scale of planned growth is proportional to public transport capacity in the area. Where appropriate, <b>the Mayor will respond to Local Plans outside London and</b> support <del>for example</del> Memoranda of Understanding <b>or other mechanisms</b> to formalise partnership		Clarification

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		agreements/commitments between relevant authorities.		
MSC.2.44	SD3 Paragraph <b>2.3.8A</b>	<i>Insert new paragraph 2.3.8A</i>  <b>2.3.8A</b> ..... The remaining five are orbital priorities that can help reduce transit through London and stimulate the WSE economy beyond the capital. <b>The schemes within these areas are at different planning stages. Their delivery will have to be phased.</b> <del>Some of these orbital priorities may have more capacity to accommodate additional growth than the radial ones.</del>	Barton Wilmore for developer consortium and authorities outside London	Clarification
MSC.2.45	SD4 F	F The vitality and viability of the international shopping and leisure destinations of the West End <b>(including Oxford Street, Regent Street, Bond Street and the wider West End Retail and Leisure Special Policy Area)</b> and	Westminster City Council, London Property Alliance	Clarification – for consistency with paragraph 2.4.10B

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		Knightsbridge together with other CAZ retail clusters should be supported.		
MSC.2.46	SD4 H	H The attractiveness <b>and inclusiveness</b> of the CAZ to residents, visitors and businesses should be enhanced, <b>including</b> through public realm improvements and the reduction of traffic dominance, as part of the Healthy Streets Approach (see <u>Policy T2 Healthy Streets</u> ).	The Access Association, City of London Corporation	Clarification
MSC.2.47	SD4 K	K The attractions of predominantly residential neighbourhoods, where more local uses predominate, should be conserved <b>and enhanced</b> .	Westminster City Council	Clarification
MSC.2.48	SD4 M	M Sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions within or close to the CAZ and <del>Northern</del> <b>North</b> Isle of Dogs ( <b>North</b> )	LB Tower Hamlets	Clarification

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		to support the needs of businesses and activities within these areas.		
MSC.2.49	SD4 N	N In Development Plans, boroughs should: 1) define the detailed boundaries of the CAZ, <b>the Isle of Dogs (North), town centres (including the International centres), CAZ retail clusters, Special Policy Areas</b> and specialist clusters of strategic functions having regard to the CAZ Diagram shown in Figure 2.16 2) develop locally sensitive policies to meet this Plan's objectives for the CAZ <del>3) define the detailed boundaries of the CAZ satellite and reserve locations.</del>	West End Partnership, Grosvenor Britain, Ireland, Covent Garden Community Association and Get Living London	Clarification
MSC.2.50	SD4 Paragraph 2.4.3 Footnote 10 and 11	2.4.3 For the purposes of CAZ policies, the <del>Northern</del> <b>Isle of Dogs (North) (NIODN)</b> is recognised as a CAZ 'satellite' <sup>10</sup> location for world city office functions. Future potential reserve <sup>11</sup> locations for CAZ	LB Tower Hamlets, LB Newham, East of England Local Government Association, Local	Clarification

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		<p>office functions are Stratford and Old Oak Common</p> <p><i>Amend footnotes 10 and 11</i></p> <p>10 The term 'satellite' is used to indicate that the <del>NIODN</del> is geographically separate from the CAZ but it is treated as part of the CAZ in London Plan policy</p> <p>11 These locations are <b>not formally within the CAZ and are</b> identified as future strategic reserves for nationally significant office functions in the event that future demand for office space exceeds development capacity in the CAZ. <b>Specific policy directions for Stratford and Old Oak Common are contained within supporting text to Policy SD1 (Opportunity Areas) and Annex 1 (Town Centre Network).</b></p>	London Partnership and Get Living London	
MSC.2.51	SD4 Paragraph 2.4.4A	<i>Insert new paragraph 2.4.4A</i>	LB Islington, City of London Corporation,	Clarification

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		<b>2.4.4A Development Plans should set out the appropriate balance between the various CAZ strategic functions in different parts of the CAZ having regard to local circumstances.</b>	Covent Garden Community Association	
MSC.2.52	SD4 Paragraph 2.4.5A	<i>Insert new paragraph 2.4.4A</i> <b>2.4.5A The City of London and the Isle of Dogs (North) are nationally important locations for globally-oriented financial and business services. The West End is a vibrant mixed-use business location, an internationally-renowned shopping, cultural and visitor destination and home to several world-leading academic institutions as well as a significant residential population. The unique roles of these locations and their strategic contribution to the economy, culture and identity of the capital should be promoted and enhanced.</b>	London First, London Property Alliance, West End Partnership, Grosvenor Britain & Ireland, Capco Covent Garden, New West End Company, Crown Estate, Landsec, Heart of London Business Alliance	Clarification

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MSC.2.53	SD4 Paragraph 2.4.7 Footnote 14.	2.4.7 The distinct <b>environment and heritage</b> of the CAZ should be sustained and enhanced through development decisions, Local Plans and other initiatives <sup>14</sup> such as the transformation of <b>the</b> Oxford Street <b>district</b> .  <sup>14</sup> Mayor's Environment Strategy 201 <del>87</del>	West End Partnership, Grosvenor Britain & Ireland, London First, London Property Alliance	Clarification
MSC.2.54	SD4 Paragraph 2.4.8 Footnote 15	<sup>15</sup> Mayor's Environment Strategy 201 <del>87</del> Details on the TfL website: <a href="https://tfl.gov.uk/modes/driving/emissions-surcharge">https://tfl.gov.uk/modes/driving/emissions-surcharge</a> , <a href="https://tfl.gov.uk/modes/driving/ultra-low-emission-zone">https://tfl.gov.uk/modes/driving/ultra-low-emission-zone</a> ; See also the Mayor's Environment Strategy 201 <del>87</del> .		Factual update.
MSC.2.55	SD4 Paragraph 2.4.10	2.4.10 ..... It contains a range of unique centres and mixed-use clusters with a predominant retail function which perform different roles in the wider London Plan town centre network (see		Clarification

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		<b><u>Policy SD8</u></b> <del>Town Centre</del> <b>network policies</b> ) including: ...		
MSC.2.56	SD4 Paragraph 2.4.11	2.4.11.... Within this context the vitality and viability of the international shopping centres and other CAZ retail clusters above should be enhanced, <b>supporting their adaptation and diversification</b> , along with improvements to the quality of the environment and public realm.	London First, London Property Alliance, New West End Company, Crown Estate, Grosvenor Britain & Ireland, Capco Covent Garden, Heart of London Business Alliance	Clarification
MSC.2.57	SD4 Paragraph 2.4.12 New footnote 16A	2.4.12 The CAZ contains several other important <b>specialist clusters of activity</b> which contribute towards the capital's international and national roles. These clusters <del>include</del> <b>contain significant concentrations of strategic</b> functions of <b>arts and culture</b> , state, health, law and education and are represented spatially in the CAZ Diagram (Figure2.16) ..... the Welcome Trust and the Francis Crick	London Property Alliance, LB Tower Hamlets	Clarification



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		<p>Institute (and on the CAZ fringe<sup>16A</sup> at Whitechapel and White City).</p> <p><i>Insert new footnote 16A</i></p> <p><b>16A The CAZ fringe refers to areas that have a functional relationship with the CAZ and lie within reasonable proximity to the CAZ but do not lie within the Zone itself</b></p>		
MSC.2.58	SD4 Paragraph 2.4.13	<p>2.4.13 <b>Special Policy Areas are supported</b>, <del>may be defined locally in specific and exceptional circumstances</del> <b>particularly</b> where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to London's unique identity, economic function or cultural heritage.</p>	Westminster City Council, Just Space	Clarification
MSC.2.59	SD4	2.4.13.....Given the operation of the Use Classes Order and permitted	Westminster City Council, Just Space	Clarification

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	Paragraph 2.4.13	development rights, Special Policy Areas often require the collaboration of landowners to achieve their objectives. <del>They should only be defined in the above exceptional circumstances to avoid stifling innovation and change that is one of the defining features of the CAZ.</del>		
MSC.2.60	SD4 Figure 2.16	<i>MAP TO BE AMENDED</i> <b>Figure 2.16 – CAZ Diagram</b>		Factual Update
MSC.2.61	SD4 Figure 2.16	Insert the indicative area of the ‘West End’ (to match the indicative boundary in the West End Partnership vision).  Refinement to the area covered by the West End cluster of Arts, culture and entertainment and amend key to read:  ‘1. West End <b>(including Soho/Covent Garden)</b> ’.	West End Partnership	Clarification
MSC.2.62	SD4	Minor refinement to the indicative area of the Victoria Opportunity Area	London Property Alliance, Landsec	Clarification

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	Figure 2.16			
MSC.2.63	SD4 Figure 2.16	Minor refinement to the indicative area of the Isle of Dogs (North)	Individual	Clarification of the indicative area covered by the Isle of Dogs (North).
MSC.2.64	SD4 Figure 2.16	Amend key: <b>Retail clusters and</b> Town Centres		Consistency
MSC.2.65	Figure 2.16	Amend key: 3 King's Cross <del>–St. Pancreas</del>	LB Camden	Consistency
MSC.2.66	Figure 2.16	Amend key: 9 London Bridge, <del>Borough and</del> Bankside		Consistency
MSC.2.67	SD4 Paragraph 2.4.15	2.4.15 <b>Digital connectivity</b> and associated infrastructure is a key consideration in the CAZ where densities of commercial development in particular are high. Where necessary, <b>applicants</b>	London Forum of Civic and Amenity Societies	Clarification

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		<b>development proposals</b> should seek to aggregate demand in areas not currently served by high-speed connectivity and liaise jointly with providers to ensure that infrastructure requirements can be planned and delivered appropriately (see <u>Policy SI6 Digital connectivity infrastructure</u> ).		
MSC.2.68	SD4 Paragraph 2.4.16	2.4.16 Local Plans and development proposals should respond to issues related to climate change taking into account the distinct circumstances of the CAZ including the <b>urban heat island effect</b> (whereby the CAZ suffers from higher local temperatures than surrounding parts of London) and its vulnerability to <del>surface water</del> <b>flooding</b> due to low-lying land and the high proportion of impermeable surfaces.	Environment Agency	Clarification

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MSC.2.69	SD5 B	B Residential development is not appropriate in <b>defined parts the commercial core</b> of the City of London and Northern Isle of Dogs (detailed boundaries to be defined by boroughs in Development Plans).	City of London Corporation	Clarification
MSC.2.70	SD5 C and D	<i>Deletion of clauses C 1 – C 5</i> <i>Clauses D 1 and D 2 are combined</i>  C Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in <b>all other core commercial</b> areas of the CAZ <b>except including:</b>  1) <del>other parts of the City of London and Northern Isle of Dogs (outside core areas in part B above)</del>	LB Islington, LB Tower Hamlets, LB Camden, Westminster City Council, Heart of London Business Alliance, London Forum of Civic and Amenity Societies, London Property Alliance, Unite Students, Drew, Stevenson	Clarification to simplify the provisions of SD5 Parts C and D.

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		<p><del>2) the West End, Knightsbridge and other core commercial areas in the City of Westminster including Soho, Covent Garden, its Opportunity Areas and commercial parts of Marylebone and Fitzrovia</del></p> <p><del>3) commercial core areas identified in the City Fringe/Tech City Opportunity Area Planning Framework</del></p> <p><del>4) all other Opportunity Areas (except Vauxhall, Nine Elms, Battersea and Elephant &amp; Castle)</del></p> <p><del>5) identified clusters of specialist CAZ strategic functions, CAZ retail clusters and locally identified Special Policy Areas.</del></p> <p><del>D offices and other CAZ strategic functions are given equal weight relative to new residential in other</del></p>		
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		<p><del>parts of the CAZ not covered in parts B or C above including:</del></p> <ol style="list-style-type: none"> <li>1) <b>the</b> Vauxhall, Nine Elms, Battersea <del>Opportunity Area and the</del></li> <li>2) Elephant &amp; Castle Opportunity Areas, where offices and other CAZ strategic functions are given equal weight relative to new residential; and</li> <li>3) <b>wholly residential streets or</b> predominantly residential neighbourhoods <del>or wholly residential streets</del> (with exceptions in appropriate circumstances – for example clusters of specialist CAZ strategic functions, Special Policy Areas and CAZ retail clusters).</li> </ol>		
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MSC.2.71	SD5 E	E In Development Plans, boroughs should develop local policies and define detailed boundaries for the areas in parts B, <b>and C</b> <del>and D</del> above.		Consistency
MSC.2.72	SD5 H	H Residential <b>or mixed-use</b> development proposals should not lead to a <b>net</b> loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices. <del>and/or</del> <b>To achieve this, alternative provision is made for the provision of equivalent or net additional office space can be made near the development</b> (including through swaps and credits – see part I below). <b>This should be within the CAZ and near the development.</b>	Canary Wharf Group	Clarification
MSC.2.73	SD5 Paragraph 2.5.3	2.5.3 The agglomerations of offices and other CAZ strategic functions should not be compromised by new <b>residential</b>	City of London Corporation	Clarification



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		<p><b>development.</b> Given their strategic importance, <b>as a general principle, offices and other CAZ strategic functions are given greater weight relative to new residential development in the Zone (with exceptions set out in policy).</b> <del>In particular,</del> Residential development is considered inappropriate in defined parts <del>the commercial core areas</del> of the <b>City of London and Northern Isle of Dogs</b> reflecting the prominent role of these locations in providing capacity for world city business functions. This policy will ensure that the current and future potential to assemble and deliver office development in these locations is not compromised by residential development.</p>		
MSC.2.74	SD5	<del>2.5.4 Offices and other CAZ strategic functions are given greater weight</del>		Text moved to paragraph

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	Paragraph 2.5.4	<del>relative to new residential development in the West End and other core commercial areas of the CAZ reflecting the importance attached to CAZ strategic functions in these locations.</del>		2.5.3 and consistency
MSC.2.75	SD5 Paragraph 2.5.6	2.5.6 Development Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate. <b>Evidence required to demonstrate no reasonable prospect of a site being used for offices is set out in paragraph 6.1.7 of this Plan.</b>	Federation of Small Businesses	Clarification
MSC.2.76	SD5 Paragraph 2.5.8	2.5.8 <b>Land use swaps, and credits</b> <del>and off-site contributions</del> can be used to support		Clarification

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		local balances between CAZ strategic functions and housing.		
MSC.2.77	SD6 Title	<b>Policy SD6 Town centres and high streets</b>	Vital OKR, Federation of Master Builders	Clarification
MSC.2.78	SD6 A 1	A <b>The vitality and viability of</b> London's varied town centres <del>and their vitality and viability</del> should be promoted and enhanced <del>as-by</del> : 1) <b>encouraging</b> strong, resilient, accessible, <b>and</b> inclusive <del>and viable</del> hubs <del>for</del> <b>with</b> a diverse range of uses <b>that meet the needs of Londoners, including main town centre uses, including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development uses</b>	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability

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MSC.2.79	SD6 A 2	<p>A <b>The vitality and viability of</b> London's varied town centres <del>and their vitality and viability</del> should be promoted and enhanced <del>as by</del>...</p> <p>2) <b>identifying</b> locations for mixed-use or housing-led intensification <del>and to</del> <b>optimise residential growth potential</b> <del>higher density renewal</del>, securing a high-quality environment and complementing local character and heritage assets</p>	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability
MSC.2.80	SD6 A 3	<p>A <b>The vitality and viability of</b> London's varied town centres <del>and their vitality and viability</del> should be promoted and enhanced <del>as by</del>:</p> <p>3) <del>the structure for</del> delivering sustainable access <del>by walking, cycling and public transport</del> to a competitive range of services and activities <b>by walking, cycling and public transport</b></p>	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability

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MSC.2.81	SD6 A 4	A <b>The vitality and viability of</b> London's varied town centres <del>and their vitality and viability</del> should be promoted and enhanced <del>as by</del> :  4) <b>strengthening the role of town centres as the a</b> main focus for Londoners' sense of place and local identity in the capital	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability
MSC.2.82	SD6 A 5	A <b>The vitality and viability of</b> London's varied town centres <del>and their vitality and viability</del> should be promoted and enhanced <del>as by</del> :  5) <b>ensuring town centres are</b> the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability

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MSC.2.83	SD6 A 6	A <b>The vitality and viability of</b> London's varied town centres <del>and their vitality and viability</del> should be promoted and enhanced <del>as</del> <b>by</b> :  6) <del>a key mechanism for supporting the role of town centres in</del> building sustainable, healthy, <b>and</b> walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management	Crest Nicholson PLC, London Assembly Planning Committee	Clarification and Readability
MSC.2.84	SD6 B	B The adaptation and <del>restructuring</del> <b>diversification</b> of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.	LB Richmond Upon Thames, LB Islington	Clarification
MSC.2.85	SD6 C	C The potential for new housing within and on the edges of town centres should be realised	LB Brent, LB Harrow, LB Bexley, individual	Clarification

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		through <del>higher-density</del> mixed-use or residential development <b>that makes best use of land</b> , capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.		
MSC.2.86	SD6 C	C .....future accessibility by public transport. Residential-only schemes in town centres may <del>be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.</del>	LB Haringey, LB Harrow, LB Southwark, LB Tower Hamlets, LB Brent, LB Islington	Clarification - text moved to supporting text
MSC.2.87	SD6 D	D The particular suitability of town centres <b>to accommodate a diverse range of housing should be considered and encouraged, including</b> <del>for</del> smaller households, Build to Rent, older people's housing and student accommodation <del>should be considered and encouraged.</del>	Local London Partnership, Westminster	Clarification

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MSC.2.88	SD6 E	E The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see <u>Policy E1 Offices</u> ) and the need for affordable <b>and low-cost</b> business space ( <b><u>Policy E2: Low-cost business space</u></b> , <u>Policy E3 Affordable workspace</u> )....	LB Islington, LB Harrow, LB Haringey, Vital OKR	Clarification
MSC.2.89	SD6 HA	<i>Insert new policy sub clause HA</i> <b>HA The varied role of London's high streets should be supported and enhanced.</b>	Vital OKR, Federation of Master Builders	Clarification
MSC.2.90	SD6 I	I The provision of social infrastructure should be enhanced, <b>particularly where it is necessary to support identified need from town centre and local residents</b> , and facilities should be located in places that maximise footfall to surrounding town centre uses.	London Assembly Planning Committee	Clarification



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MSC.2.91	SD6 Paragraph 2.6.1	<p>2.6.1 London's town centres are central to the lives of Londoners. They provide a focus for the local community, both geographically and in relation to the sense of identity and broad mix of uses they provide. <b><u>Policy SD6 Town centres and high streets does not apply to CAZ Retail Clusters or any town centres located wholly within the Central Activities Zone (CAZ).</u></b></p> <p><b>19A - Policy SD6 Town centres and high streets applies to the entirety of Angel town centre and Elephant and Castle town centre.</b></p>	City of London Corporation, Westminster City Council	Clarification
MSC.2.92	SD6 Paragraph 2.6.1A	<p><i>Paragraphs 2.6.1 is split into two paragraphs.</i></p> <p><b>2.6.1A</b> The spaces within and around town centres have an important public</p>		

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		function, with high streets, public squares, markets, parks, gardens.....		
MSC.2.93	SD6 Paragraph 2.6.1B	<b>2.6.1B High streets are one of London's most characteristic urban features which play an important role in terms of local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange. The character and function of high streets within town centres should be promoted and enhanced.</b>	Vital OKR, Federation of Master Builders	Clarification
MSC.2.94	SD6 Paragraph 2.6.2	2.6.2 <b>Over the years</b> <del>T</del> town centres have <del>over the years</del> absorbed change and new technologies. To continue to thrive they will need to evolve and diversify in response to current and		Clarification and Readability
MSC.2.95	SD6 Paragraph 2.6.2	2.6.2....This <b>need for adaptation and diversification</b> , together with their good public transport accessibility, makes	LB Brent, LB Harrow, LB Bexley	Clarification

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		many town centres appropriate locations for residential-led <b>intensification</b> or mixed-use <del>high-density</del> development <b>that makes best use of land.</b>		
MSC.2.96	SD6 Paragraph 2.6.4A	<i>Insert new paragraph 2.6.4A</i> <b>2.6.4A Residential development plays an important role in ensuring town centre vitality, particularly through the delivery of diverse housing. Residential-only schemes in town centres may be appropriate outside the primary shopping area and primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.</b>	Silvertown Homes, Redrow Homes London Division	Clarification

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MSC.2.97	SD7 and SD8	<i>Policies SD7 and SD8 have been swapped</i>	City of London Corp, LB Southwark	Readability - SD6 and current SD8 do not apply to Town Centres located wholly within the CAZ.
MSC.2.98	<del>SD8</del>	<b>Policy SD87 Town centres: development principles and Development Plan Documents</b>	City of London Corp, LB Southwark	
MSC.2.99	<del>SD8</del> A 1	A Development Plans and development proposals should take a town centres first approach by:  1) <del>adopting a</del> <b>applying the</b> sequential approach <del>test</del> <b>to applications for accommodating main</b> town centre uses, <del>including retail, commercial, offices, leisure, entertainment, culture, tourism</del>	Galliard Homes, LB Tower Hamlets, Halfords, LB Islington	Clarification and readability

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		<del>and hotels such that new development of these uses is focused on sites within</del> town centres, <del>or then</del> (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport		
MSC.2.100	SD <del>8</del> 7 A 2	A Development Plans and development proposals should take a town centres first approach by  2) <del>firmly resisting discouraging</del> out-of-centre development...	Ministry of Housing, Communities and Local Government, Lidl UK GmbH, Halfords, Sainsburys Supermarkets Ltd, Silvertown Homes, London Hotel Group, Next Plc	Clarification
MSC.2.101	SD <del>8</del> 7 A 2	A Development Plans and development proposals should take a town centres first approach by:	Galliard Homes LB Tower Hamlets, Halfords	Clarification

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		2)... <b>main</b> town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see <u>Policy E1 Offices</u> )		
MSC.2.102	SD <del>87</del> A 3	A Development Plans and development proposals should take a town centres first approach by:  3) providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for <del>town centre-retail,</del> <b>leisure and office</b> uses in part A(1) above that are not in accordance with the Development Plan	LB Tower Hamlets	Clarification
MSC.2.103	SD <del>87</del> B <b>1A</b>	<i>Insert new clause B 1A:</i>  B In Development Plans, boroughs should:	London Assembly Planning Committee, Just Space	Clarification

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		<b>1A) consider the protection of out-of-centre high streets as neighbourhood centres, local parades or business areas and develop appropriate policies to support and enhance the role of these high streets, subject to local evidence, recognising the capacity of low-density commercial sites, car parks and retail parks for housing intensification and mixed-use redevelopment (see Policy H1 Increasing housing supply)</b>		
MSC.2.104	SD <del>8</del> 7 B 2	B In Development Plans, boroughs should:  2) develop policies through strategic and local partnership approaches ( <u>Policy SD9 Town centres: Local partnerships and implementation</u> ) to meet the objectives for town centres set out in <u>Policy SD6 Town centres</u> <b>and high streets</b> to support the development,		Factual update

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		intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network ( <u>Policy SD78 Town centre network</u> )		
MSC.2.105	SD87 B 3	B In Development Plans, boroughs should:  3) develop policies for <del>the</del> edge <b>and fringes</b> of town centres <b>areas</b> , revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses <del>particularly in secondary frontages</del> taking into account local circumstances	Halfords, LB Tower Hamlets	Clarification
MSC.2.106	SD87 B 4 <b>dA</b>	<i>New policy B 4) dA):</i> B In Development Plans, boroughs should:	LB Redbridge, individuals	Clarification



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		4) ..Criteria to consider in assessing the potential for intensification in town centres include:..  <b>dA) capacity and proximity of social infrastructure</b>		
MSC.2.107	Paragraph 2. <del>87</del> .1 New footnote 21A	2. <del>87</del> .1 ...In order to support the vitality of town centres, it is important to take a sequential approach, focusing on sites within town centres before considering edge-of-centre sites. This ensures that town centre uses are not unnecessarily dispersed, maximises the overall growth potential of town centres and promotes investment in high streets and primary shopping frontages. <b>Policy SD7 Town centres: development principles and Development Plan Documents does not apply to CAZ Retail Clusters or any town centres located wholly within the Central Activities Zone (CAZ)<sup>21A</sup>.</b>	City of London Corporation, Westminster City Council	Clarification

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		<i>Insert new footnote 21A</i> <b>21A Policy SD7 Town centres: development principles and Development Plan Documents applies to the entirety of Angel town centre and Elephant and Castle town centre.</b>		
MSC.2.108	Paragraph 2. <del>87</del> .2	2. <del>87</del> .2 Where <b>edge-of-centre</b> developments <del>of town centre retail, leisure and office</del> uses are proposed, and are not in accordance with the Development Plan, these should be accompanied by a robust and detailed impact assessment. This applies to <del>retail, leisure and office</del> development greater than <b>a locally set floorspace threshold</b> , or 2,500 sq m <b>if a local floorspace threshold has not been set.</b>	LB Hackney, LB Tower Hamlets	Clarification
MSC.2.109	Paragraph 2. <del>87</del> .4	2. <del>87</del> .4The <b>location, design, type, and level of fit-out</b> of commercial uses, particularly those in mixed-use	LB Westminster	Clarification and Readability

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		development, should support the town centres first approach and ensure that commercial premises make a positive contribution to the vitality of the area and are quickly occupied. <del>Out-of-centre housing-led developments should seek to maximise the provision of housing and create active frontages and welcoming streetscapes through the provision of ground floor windows, front doors and front gardens where appropriate.</del>		
MSC.2.110	SD <del>7</del> <b>8</b> Title	<b>Policy SD<del>7</del><b>8</b> Town centre network</b>		Readability - SD6 and current SD8 do not apply to Town Centres located wholly within the CAZ.
MSC.2.111	SD <del>7</del> <b>8</b> B	B Identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher	LB Harrow	Clarification

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		level in the network, designating new centres (see Annex 1) or reassessing town centre boundaries (see Policy SD87 Town centres: development principles and Development Plan Documents). <b>Diversification in Ccentres</b> with current or projected declining demand for commercial, particularly retail, floorspace <b>should be supported. These centres</b> may be reclassified at a lower level in the hierarchy <b>through a coordinated approach with local planning authorities.</b>		
MSC.2.112	SD <del>7</del> <b>8</b> C	C The classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan. Potential future changes to the strategic town centre network are set out in Figure A1.1 in Annex 1. Changes to District, Local, <del>and</del> Neighbourhood centres <b>and CAZ Retail</b>	City of London Corporation	Clarification

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		<b>Clusters</b> can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate (see <u>Policy SD<del>87</del> Town centres: development principles and Development Plan Documents</u> ).		
MSC.2.113	SD <del>78</del> E	E District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, <b>social infrastructure</b> , local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.	Levitt Bernstein	Clarification

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MSC.2.114	Paragraph 2. <del>78</del> .4	2. <del>78</del> .4 <del>These</del> <b>Centres with a future potential network classification in Table A1.1 (Town Centre Network)</b> are not recommended for immediate reclassification, however it is recognised that they may be appropriate for future reclassification, subject to strategic and Local Plan policies and conditional on matters such as capacity analysis, impact assessments, land use, public transport, walking and cycling, planning approvals and full implementation.	London Forum of Amenity and Civic Societies	Clarification
MSC.2.115	Paragraph 2. <del>78</del> .4	2. <del>78</del> .4 ...Many of the areas identified as future potential town centres, and centres with the potential to be reclassified at a higher level in the town centre hierarchy (see Annex 1), currently contain retail parks, dominated by large format stores and heavily reliant on travel by car. For these areas to be reclassified, a <b>clear strategy</b> should be		Clarification

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		developed and implemented ( <b>see Policy SD9 Town centres: Local partnerships and implementation</b> ) that secures a broader mix of store sizes and formats and a variety of town centre uses including retail, leisure, employment and social infrastructure, subject to demand, capacity and impact.		
MSC.2.116	Figure 2.17	Figure 2.17 to be updated to align with changes to Table A1.1 in Annex One.		Alignment with suggested changes to Annex One.
MSC.2.117	SD9 A	A <b>Strategic and local partnership approaches should be supported and encouraged</b> to develop strong, resilient and adaptable town centres, fulfilling their <del>full</del> potential to accommodate growth and development. <del>., strategic and local partnership approaches, community engagement, These partnerships may</del>	Green Party Group, London Forum of Amenity and Civic Societies	Clarification

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		<p><b>be in the form of</b> town centre management, business associations, <b>Neighbourhood Forums, trader associations</b> and Business Improvement Districts, <b>and should be inclusive and representative of the local community.</b> <del>should be supported and encouraged. Each town centre should have a Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.</del></p>		
MSC.2.118	SD9 AA	<p><i>Insert new policy sub-clause AA</i></p> <p><b>AA The development of Town Centre Strategies is encouraged, particularly for centres that are undergoing transformative change, have projected declining demand, have significant infrastructure planned or are identified as future potential centres in Table A1.1. Town Centre Strategies should be produced in partnership at</b></p>	LB Camden, LB Bexley, LB Havering, LB Bromley, LB Redbridge, LB Southwark, Westminster City Council	Clarification



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		<b>the local level in a way that is inclusive and representative of the local community.</b>		
MSC.2.119	SD9 Paragraph 2.9.1	2.9.1 .....All town centres, however, will change – many of them significantly – due to the restructuring of the retail sector and other changes in the wider economy. <del>...It is therefore crucial that a</del> <b>A strategy is-should therefore be developed for each town centres that are experiencing significant change, such as projected declining demand, or significant planned infrastructure, or town centres that are identified as future potential centres in Table A1.1. This is, necessary</b> to ensure that the local community continues to be well served and that the network of town centres across London continues to function successfully.	London Boroughs	Clarification

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MSC.2.120	SD9 Paragraph 2.9.2	2.9.2 Town Centre <b>Strategies should be tailored to each town centre</b> , <del>with a A</del> clear vision <b>should be</b> developed with the local community, taking account of the town centre's strategic role, opportunities for growth, <del>and</del> potential to support regeneration, <b>spatial characteristics, economic challenges, and location in inner or outer London.</b>	Individuals	Clarification
MSC.2.121	SD9 Paragraph 2.9.2	2.9.2..... Town Centre Strategies should pay particular regard to the social <b>and economic</b> benefits of high streets <del>and</del> <b>as well as their function and character within</b> town centres, especially the formal and informal networks that support local communities. <del>and</del> <b>They</b> should <b>also</b> have regard to commercial and social activity that serves particular groups and communities.	Individual	Clarification
MSC.2.122	SD10 A 1	A Boroughs should:		Clarification

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		1) identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans <b>and develop policies that are</b> based on a thorough understanding of the demographics of communities and their needs		
MSC.2.123	SD10 A 2A	A Boroughs should: <b>2A) engage communities, particularly those in Strategic and Local Areas for Regeneration, at an early stage and throughout the development of local development documents, strategies and regeneration programmes.</b>	London Assembly Planning Committee, Chairs of Camden's Conservation Area Advisory Committees, Camden Town CAAC, Just Space, Levitt Bernstein, Old Bermondsey Village Neighbourhood Forum, Green Party Group	Clarification
MSC.2.124	SD10 Paragraph 2.10.3	2.10.3... By taking an integrated, spatial approach to a wide range of issues, Development Plans and Opportunity	London Assembly Planning Committee, Chairs of Camden's	Clarification

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		Area Planning Frameworks have a key role to play in tackling spatial inequalities and the causes of deprivation. <b>It is important that these are developed through engagement with local communities.</b>	Conservation Area Advisory Committees, Camden Town CAAC, Just Space, Levitt Bernstein, Old Bermondsey Village Neighbourhood Forum, Green Party Group	
MSC.2.125	SD10 Paragraph 2.10.4	2.10.4 In identifying Local Areas for Regeneration, boroughs should use their local knowledge and that of their communities to <b>identify and understand the particular needs of the area</b> . The individual measures of deprivation that make up the IMD <b>and other evidence</b> should be used to identify specific areas that are affected by particular issues, and regeneration strategies, investment and the approach taken in Local Plans should be tailored to reflect these...	London Assembly Planning Committee	Clarification

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MSC.2.126	SD10 Paragraph 2.10.4	2.10.4 ... in Local Plans should be tailored to reflect these. Local Plans should <b>include policies that identify also look closely at the</b> Strategic <del>and Local</del> Areas for Regeneration and <b>address</b> the particular issues that affect them and the surrounding areas.	London Assembly Planning Committee, Chairs of Camden's Conservation Area Advisory Committees, Camden Town CAAC, Just Space, Levitt Bernstein, Old Bermondsey Village Neighbourhood Forum, Green Party Group	Clarification
MSC.2.127	SD10 Paragraph 2.10.6	2.10.6... In order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in collaboration with local communities <b>and other stakeholders</b> , involving a broad spectrum of groups and individuals, to develop a shared vision for the area...	Canal & River Trust	Clarification
<b>Chapter 3 Design</b>				

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MSC.3.1	D1	<i>Policy restructure and clauses re-ordered</i>		To clarify policy meaning and structure
MSC.3.2	D1 A & B	<p><i>Deleted first line of part A and B and reordered numbered and renumbered policy text in parts A and B and added three heading to group numbered policy text.</i></p> <p><b>Form and layout</b></p> <p><del>A1)</del></p> <p><del>A2)</del></p> <p><del>B4 2)</del></p> <p><del>A8 3)</del></p> <p><del>A3 4)</del></p> <p><del>A10 5)</del></p> <p><b>Experience</b></p> <p><del>A5 6)</del></p> <p><del>A6 7)</del></p>	London Boroughs	To clarify policy meaning and structure

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		<p><b>A4 8)</b>  <b>A7 9)</b>  <del><b>A9 10)</b></del>  <del><b>B6-11)</b></del></p> <p><b>Quality and character</b></p> <p><b>B4 12)</b>  <del><b>B2 13)</b></del>  <del><b>B3 14)</b></del>  <del><b>B5 15)</b></del></p>		
MSC.3.3	D1 Start of policy	<p><i>Changed initial policy text to part A and added new text</i></p> <p><b>A</b> Development Plans, area-based strategies and development proposals should <b>ensure the design of places</b> addresses the following <b>requirements:</b></p>	London Boroughs	To clarify policy meaning and structure

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		<p><del>A</del> <del>The form and layout of a place should:</del></p> <p><del>B</del> <del>Development design should:</del></p>		
MSC.3.4	D1 A 2	<p><i>deleted A 2 and combined it with new clause A6</i></p> <p><del>2) facilitate an inclusive environment</del></p> <p><b>Experience</b></p> <p>A5 6) achieve safe and secure <b>and inclusive</b> environments</p>	London Boroughs	To clarify policy meaning and structure and remove repetitive text.
MSC.3.5	D1 A 2 previously B1	<p><b>Form and layout</b></p> <p><del>B1 2) respond</del> <b>enhance</b> local context by delivering buildings and spaces that <b>positively respond to local distinctiveness through their layout, orientation, are positioned and of a</b> scale, appearance and shape, <b>with due regard to that</b></p>	London Boroughs	Clarification



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		<del>responds successfully to the identity and character of the locality, including to</del> existing and emerging street		
MSC.3.6	D1 A 6 previously A5	<b>Experience</b> <del>A5 6)</del> achieve safe and secure <b>and inclusive</b> environments	London Boroughs	Clarification
MSC.3.7	D1 A 11 previously B6	<b>Experience</b> <del>B6 11)</del> achieve indoor and outdoor environments that are comfortable and inviting for people to use <b>environments both inside and outside buildings.</b>	Highgate Society	Clarification
MSC.3.8	D1 A 11 previously B4	<b>Quality and character</b> <del>B4 12)</del> <b>respond to the existing character of a place by identifying the special and valued features that are unique</b>	London Boroughs, Natural England	Clarification

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		<b>to the locality and</b> respect, enhance and utilise the heritage assets and architectural features that <del>make up</del> contribute to the local character		
MSC.3.9	D1 A 14 Previously B3	<b>Quality and character</b> <del>B3</del> 14) aim for high sustainability standards <b>(with reference to the policies within London Plan Chapter's 8 and 9)</b>	Environment Agency	Clarification
MSC.3.10	D1 Paragraph 3.1.1A	<b>3.1.1A This Plan provides a policy framework for delivering Good Growth through good design. Policies D1 London's form and characteristics and D2 Delivering good design work together to embed good design principles from the outset of the design process and ensure these are carried through to the completion of a development.</b>	London Boroughs	Clarification

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		<b>Policy D1 sets out the key characteristics that should be delivered through the design of London's buildings and spaces in terms of their form and layout, quality and character, and the user experience they provide. Throughout the period of assessment of planning applications, boroughs and applicants should cross reference between policies D1 and D2 to ensure these key design principles are addressed and carried through each stage of the planning and design process.</b>		
MSC.3.11	D1 Paragraph 3.1.1	3.1.1.....This means coordinating the layout of the development with the form and scale of the buildings and the location of the different land uses, and facilitating convenient pedestrian connectivity to activities and services		Consistency

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		(see also <u>Policy D6 Optimising <b>housing density</b></u> ).		
MSC.3.12	D1 Paragraph 3.1.2	<i>Paragraph 3.1.2 split into 3 paragraphs</i>  3.1.2 Developments that show a clear understanding of, and relationship with, <del>the context of the site</del> <b>distinctive features of a place</b> are more likely to be successful. <b>These features include buildings, structures, open spaces, public realm and the underlying landscape. Development should be designed to respond to the special characteristics of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value.</b>	London Boroughs, Natural England, Landscape Institute, L&Q,  Barratt Dev. Countryside Properties Individuals	Clarification

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MSC.3.13	D1 Paragraph 3.2.1A	<b>3.1.2A As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued.</b>		Clarification
MSC.3.14	D1 Paragraph	<i>Existing paragraph 3.1.2 split</i>		Readability

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	3.1.2B	<b>3.1.2B</b> Buildings should be of high quality and enhance, activate and appropriately frame the public realm.....		
MSC.3.15	D2 A1	A .... in preparing Development Plans and area-based strategies, which covers the following elements:  1 ) <b>demographic make-up and</b> socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)		Clarification
MSC.3.16	D2 B	B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate forms of development for an area in		Clarification

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		terms of scale, height, density, layout and land uses...		
MSC.3.17	D2 C	C Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform <b>plan-making</b> and <b>decision-taking, and to</b> engage Londoners in the planning process.	Historic England	Clarification
MSC.3.18	D2 F	<b>Design scrutiny</b> F <b>The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in the policy, local evidence, and expert advice where</b>	London Boroughs, Historic England	Clarification

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		<p><b>appropriate. In addition b</b>Boroughs and applicants should <b>make use of the</b> design review process to assess and inform design options early in the planning process. <del>Design review should be in addition to the borough's planning, urban design, and conservation officers' assessment and pre-application advice.</del> Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation, before a planning application is made, <b>or demonstrate that it has undergone a local borough process of design scrutiny, based on the principles set out in part G</b>, if they:</p>		
MSC.3.19	D2 F 1	F .....if they:		Factual Update



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		1) are above the applicable density indicated in Part C of <u>Policy D6 Optimising <del>housing</del> density</u> ; or		
MSC.3.20	D2 H 1	<p>H The design quality of development should be retained through to completion by:</p> <p>1) <b>ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development</b> <del>having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the</del></p>	London Boroughs	Clarification

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		<del>permitted scheme is subject to subsequent minor amendments</del>		
MSC.3.21	D2 H 4	H The design quality of development should be retained through to completion by:  4) local planning authorities <b>considering conditioning the ongoing involvement of the original design team to monitor design quality of a development through to completion using architect retention clauses in legal agreements where appropriate.</b>	Businesses London Boroughs Agents	Clarification
MSC.3.22	D2 Paragraph 3.2.1	3.2.1 <b>Policy D1 London's form and characteristics and Policy D2 Delivering good design should be read together. It is intended that t</b> <del>he</del> processes and actions set out in <u>Policy D2 Delivering good design</u> will help ensure development delivers good design <b>as</b>	London Boroughs, Businesses, Community Groups, Agents	Clarification

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		<b>demonstrated by the principles and best practice outcomes set out in Policy D1.</b>		
MSC.3.23	D2 Paragraph 3.2.2	3.2.2 ...help inform an understanding of an area's capacity for growth. <b>Figure 3.2 illustrates the broad characteristics of London as derived from its historical development, which can be used to inform evidence bases for area-based strategies.</b>		Clarification
MSC.3.24	D2 Paragraph 3.2.6	3.2.6 The Mayor's Design Advocates <b>(MDAs)</b> will play a key role in helping to deliver good design. They will help champion design across the GLA Group and beyond, through research, design review, capacity building, commissioning and advocacy. <b>MDAs are also panel members of the London Review Panel, which the Mayor has set up to provide design scrutiny. This review panel is</b>	London Boroughs, Businesses, Agents	Clarification

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		<b>primarily focused on the review of Mayoral investments, but can provide design review sessions for development proposals referred to the Mayor, where they have not previously been subject to review, or for schemes of particular significance.</b>		
MSC.3.25	D2 Paragraph 3.2.7	3.2.7 All development proposals should <del>follow this guidance, and</del> be subject to a level of scrutiny appropriate to the scale <b>and/or impact</b> of the <b>project site</b> . This design scrutiny should include work by planning case officers and ongoing and informal review by qualified urban design <b>officers and conservation</b> officers. <del>as well as formal design review</del> <b>Development proposals required to undergo design review as set out under Part F will form a small portion of overall planning applications</b>	Businesses, London Boroughs, Agents, Historic England	Clarification

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		<b>in London. The Mayor may require that other referable developments undergo design review. Boroughs are encouraged to use design review to support their scrutiny of development proposals.</b>		
MSC.3.26	D2 Paragraph 3.2.7 A	<b>3.2.7A The Mayor has published a London Quality Review Charter, with accompanying guidance. The Charter promotes a consistent approach across London's design review sector, and promotes transparency of process. The Charter builds on the established guidance (from the Design Council Commission for Architecture and the Built Environment (CABE), Landscape Institute (LI), Royal Town Planning Institute (RTPI) and the Royal Institute of British Architects (RIBA)), which calls for reviews to be</b>	Businesses, London Boroughs, Agents, Historic England	Clarification

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		<p><b>independent, expert, multidisciplinary, accountable, transparent, proportionate, timely, advisory, objective and available. The Charter Mayor has produced guidance on design reviews, including guidance on how panels and processes should be managed and records kept. It also clarifies that the purpose of the design review process is not to dictate the design of a scheme or contradict planning policy, but to guide better design outcomes. More widely, the Mayor's Good Growth by Design Programme, is developing a support offer to London's boroughs and London's review sector, for example, offering advice to boroughs wishing to put in place a design review function.</b></p>		
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MSC.3.27	D2 Paragraph 3.2.10	3.2.10 It is generally beneficial to the design quality of a completed development if the architectural design team is involved in the development from start to finish <sup>24</sup> . Consideration should be given to <b>securing the design team's ongoing involvement</b> as a condition of planning permission, <del>or</del> as a design reviewer, <b>or through an architect retention clause in a legal agreement.</b> <del>where this is not possible.</del>	Businesses, London Boroughs, Agents	Clarification
MSC.3.28	Figure 3.2	<i>Previously Figure 7.4 inserted after paragraph 3.2.10</i>  Figure 3.2 Outline Character Map of London		Clarification
MSC.3.29	D3 A 1	A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of	The Access Association	Clarification and consistency with D11

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		<p>accessible and inclusive design, ensuring they:</p> <p>1) can be entered, <del>and</del> used <b>and exited</b> safely, easily and with dignity by all</p>		
MSC.3.30	D3 A 3	<p>A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:</p> <p>3) are designed to incorporate safe and dignified emergency evacuation for all building users. In <b>all</b> developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a <b>sufficiently sized</b> fire evacuation lift suitable to be used to</p>		Consistency with D11



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		evacuate people who require level access from the building.		
MSC.3.31	D3 Paragraph 3.3.1A	<b>3.3.1A It is essential to consider inclusive design at the earliest possible stage in a scheme's development, and inclusive design should be embedded into a project from initial conception through to completion, occupation and in the on-going management and maintenance of the development. Master plans and design codes should therefore embed and document the highest standards of inclusive design, for this approach to be carried forward throughout the development of projects.</b>	Rachael Marshall, Habinteg, Richard Lee, Central Ealing, Residents Association	Clarification
MSC.3.32	D3 Paragraph 3.3.2	3.3.2 ..... Links to the wider neighbourhood for all pedestrians should be carefully considered,	LB Islington	Clarification and Consistency

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		including networks of <b>legible, logical, safe and</b> navigable <del>safe</del> pedestrian routes, dropped kerbs and crossing points with associated tactile paving.		
MSC.3.33	D3 Paragraph 3.3.2	3.3.2..... pedestrian routes, dropped kerbs and crossing points with associated tactile paving. <del>Links into the neighbourhood for all pedestrians should be carefully considered, including networks of navigable safe pedestrian routes, dropped kerbs and crossing points with associated tactile paving.</del>	London Boroughs, The Access Association	Readability
MSC.3.34	D3 Paragraph 3.3.5	3.3.5 ..... 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 <b>mechanical</b> devices <b>or similar interventions that rely on manual handling</b> are not considered to	LB Hillingdon	Clarification

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		be appropriate, for reasons of user dignity and independence.		
MSC.3.35	D3 Paragraph 3.3.5	3.3.5 ..... The installation of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. <del>Elements of construction forming refuges, evacuation lift enclosures and lobbies should incorporate suitable levels of fire resistance.</del> <b>Associated with these, suitable levels of fire resistance should be achieved to the enclosures of fire evacuation lifts/ shafts, associated refuges and any lobbies. See also D11 Fire safety.</b>		Clarification and consistency with D11
MSC.3.36	D3 Paragraph 3.3.7	3.3.7 Inclusive design principles should be discussed with boroughs in advance of an application being submitted, to ensure that these principles are understood and incorporated into the		Clarification

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		original design concept. To demonstrate this, <b>and to inform decision making, speed up the process and bring about better-quality development,</b> an <b>inclusive design statement</b> is required as part of the Design and Access Statement.		
MSC.3.37	D3 Paragraph 3.3.7	<p>3.3.7.....The inclusive design statement should:</p> <ul style="list-style-type: none"> <li>explain the design concept and illustrate how an inclusive design approach has been incorporated into this</li> <li><b>detail what best practice standards and design guidance documents have been applied in terms of inclusive design</b></li> <li>show that the potential impacts of the proposal on people and communities</li> </ul>	Police Crime Prevention Initiatives Limited  Lift and escalator industry association	Clarification and Readability

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		<p>who share a protected characteristic have been identified and assessed</p> <ul style="list-style-type: none"> <li>highlight any historical contextual considerations</li> <li>set out how inclusion will be maintained and managed, including fire evacuation procedures</li> <li><del>detail how relevant best practice standards and design guidance have been applied, and</del> <b>highlight</b> how relevant planning policy and legal requirements (including, where relevant, the Public Sector Equality Duty of the Equality Act 2010) have been responded to</li> </ul>		
MSC.3.38	D3 Paragraph 3.3.7A	<b>3.3.7A The planning of inclusive design elements of development proposals and the drafting of inclusive design statements should be undertaken by or have input from a suitably qualified specialist with relevant</b>	IDaAP, NRAC, Withernay Projects, Centre for accessible environments, The Access Association,	Clarification

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		<b>experience in inclusive design, such as a member of the National Register of Access Consultants. Local authority access officers or inclusive design advisors should assist in the evaluation of development proposals and inclusive design statements in terms of inclusive design.</b>	Martin McConaghy, Arup	
MSC.3.39	D3 Paragraph 3.3.8	3.3.8 The Mayor will assist boroughs and other agencies in implementing an inclusive design approach in all development proposals by providing further guidance where necessary, continuing to contribute to the development of national technical standards and supporting training and professional development programmes. Further guidance on inclusive design standards can be found in the <b>following</b> British Standards <del>documents BS8300 Volumes 1 and 2.:</del>	Barnet Society, Centre for Accessible Environments	Factual Update

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		<ul style="list-style-type: none"> <li>• <b>BS8300-1:2018 Design of an accessible and inclusive built environment. External environment. Code of practice. January 2018.</b></li> <li>• <b>BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice. January 2018.</b></li> </ul>		
MSC.3.40	D4 A - G	<i>Clauses A-G re-order and some combined</i>		Clarification and Readability
MSC.3.41	D4 A and B	<p><i>Clauses A and B combined</i></p> <p><del>A To optimise the development of housing on sites across London a range of housing typologies will need to be built. To bring forward development on constrained sites, innovative housing designs that meet the requirements of</del></p>	RB Kingston	Clarification

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		<p><del>this policy, including minimum space standards, are supported. In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures.</del></p> <p><b>A B</b> <del>Housing development</del> New homes should <b>be of high quality design, and provide</b> <del>have</del> adequately-sized rooms <b>(see Table 3.1), with comfortable and functional</b> <del>convenient and efficient room</del> layouts, which are <b>functional</b>, fit for purpose and meet the <del>changing</del> needs of Londoners, <b>without differentiating between tenures.</b> <del>over their lifetimes. Particular account should be taken of the needs of children, disabled and older people.</del></p>		
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MSC.3.42	D4 B previously C	<b>B</b> <del>C</del> Qualitative aspects of a development are key to ensuring successful sustainable housing <del>and should be fully considered in the design of any housing developments.</del> <b>Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.</b>	LB Tower Hamlets, LB Merton, RB Kensington and Chelsea, Mubin Trust for London	Clarification
MSC.3.43	D4 C previously E	<b>C</b> <del>E</del> <b>Residential-Housing</b> development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of <u>Policy D1 London's form and characteristics</u> than a dual aspect dwelling and it can be	London Environment Directors' Network, Environmental Services Association, SUEZ Recycling and Recovery UK Ltd	Clarification

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		demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.		
MSC.3.44	D4 D	<del>D</del> <i>Moved. See below</i>	LB Tower Hamlets, LB Merton	Clarification
MSC.3.45	D4 E	E <del>Residential-Housing</del> development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single		Clarification
MSC.3.46	D4 G	G <del>Dwellings-Housing</del> should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass)	LB Tower Hamlets, LB Merton, RB Kensington and Chelsea, Mubin Trust for London	Clarification

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		food <b>waste as well as residual waste.</b>		
MSC.3.47	D4 GA  Previously D9 and D10	<del>D-GA</del> Housing developments are required to meet the minimum standards below: <b>which</b> <del>These standards</del> apply to all tenures and all residential accommodation that is self-contained.  9) <b>A Where there are no higher local standards in the borough development plan documents,</b> a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, <b>and it must achieve a minimum depth and width of 1.5m. This does not count towards the</b>	Mr Colin Bannon, The Putney Society	Clarification

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		<p><b>minimum Gross Internal Area space standards required in Table 3.1.</b> This does not count towards the minimum Gross Internal Area space standards required in Table 3.1.</p> <p><del>10) The minimum depth and width for all balconies and other private external spaces should be 1.5m.</del></p>		
MSC.3.48	D4 Table 3.1	Table 3.1 - Minimum <b>internal</b> space standards for new dwellings	LB Waltham Forrest	Clarification
MSC.3.49	D4 Table 3.1 Key	Key b: bedrooms p: persons	Mrs Tatiana Telles Ferreria	Correction

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MSC.3.50	D4 Table 3.1 Key	* Where a studio / one <b>single</b> bedroom one person <del>one bedspace (i.e. one single bedroom)</del> dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39 sqm to 37 sqm, as shown bracketed.	Mrs Tatiana Telles Ferreria	Clarification
MSC.3.51	D4 Table 3.1 Key	<b>GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with five or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA, provided that all aspects of the space standard have been met.</b>	Mrs Tatiana Telles Ferreria	Clarification

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MSC.3.52	D4 Paragraph 3.4.2	<p>3.4.2 The space standards are minimums which applicants are encouraged to exceed. <del>However, due to the level of housing need and the requirement to make the best use of land, boroughs are encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 as they do not constitute an efficient use of land.</del> The standards apply to all new self-contained dwellings of any tenure, <b>and consideration should be given to the elements that enable a home to become a comfortable place of retreat.</b> The provision of additional services and spaces as part of a housing development, such as building management and communal amenity space, is not a justification for failing to deliver these minimum standards. <b>Boroughs are, however, encouraged</b></p>	<p>Kesslers Stratford Limited, Blackheath Society, The Wimbledon Society, LB Bexley, LB Richmond upon Thames</p> <p>LB Enfield, Canary Wharf Group, London Assembly Planning Committee , GLA Conservative Group, The Kew Society, London Forum of Amenity and Civic Societies, individuals</p>	Clarification
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		<b>to resist dwellings with floor areas significantly above those set out in Table 3.1 for the number of bedspaces they contain due to the level of housing need and the need to make efficient use of land.</b>		
MSC.3.53	D4 Paragraph 3.4.3	3.4.3 To address the impacts of the urban heat island effect and the fact that the majority of <del>residential housing</del> <b>made up of</b> flats, a <b>minimum ceiling height</b> of 2.5m for at least 75 per cent of the gross internal area is required so that new housing is of adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space.		Consistency of terminology and clarification
MSC.3.54	D4 Paragraphs 3.4.5A, 3.4.5B,	<i>Reordering of paragraphs</i> <b>3.4.5A</b> <del>3.4.10</del> <b>3.4.5B</b> <del>3.4.8</del>		Readability

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	3.4.5C, 3.4.5D and 3.4.5E	<p><b>3.4.5C</b> <del>3.4.9</del>  <b>3.4.5D</b> <del>3.4.6</del>  <b>3.4.5E</b> <del>3.4.7</del></p> <p><del>3.4.8</del> Moved  <del>3.4.9</del> Moved  <del>3.4.10</del> Moved</p>		
MSC.3.55	D4 3.4.5C	<p><b>3.4.5C</b> <del>3.4.9</del> Development should help create a more socially inclusive London. <b>Gated forms of development</b> that could realistically be provided as a public street are unacceptable and alternative means of security should be achieved through utilising the principles of good urban design <b>and inclusive design (see D3 Inclusive design)</b>.</p>	The Access Association Timothy Gill Holly Jane Wier	Clarification and Consistency
MSC.3.56	D4 Paragraph 3.4.5D	<p><b>3.4.5D</b> <del>3.4.6</del> <b>Private open-outside space</b> should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity.</p>	London Food Link/ Sustain	Clarification



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		All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of roof areas, including podiums, and courtyards for additional private or shared <b>outside</b> <del>outside or shared amenity or garden</del> space is encouraged.		
MSC.3.57	D4 Paragraph 3.4.5E	<b>3.4.5E</b> <del>3.4.7 Communal play space for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the requirement</del> <b>should meet the requirements</b> of <u>Policy S4 Play and informal recreation</u> .	Chiswick Protection Society	Clarification
MSC.3.58	D4 Paragraph 3.4.11	<i>Paragraph 3.4.11 deleted and replace with new table 3.2</i>		Clarification

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		<p><del>3.4.11—The following qualitative aspects should be addressed in the design of residential developments:</del></p> <ul style="list-style-type: none"> <li><del>• the built form, massing and height of the development is appropriate for the surrounding context, and alternative arrangements to accommodate the same number of units or bedspaces with a different relationship to the surrounding context have been explored early in the design process (making use of the measures in D6.E), particularly where a proposal is above the applicable density indicated in part C of <u>Policy D6 Optimising housing density</u></del></li> <li><del>• the urban layout, including spaces between and around buildings forms a coherent pattern of streets and blocks</del></li> <li><del>• public, communal and private open spaces relate well to each other and the wider neighbourhood</del></li> </ul>		
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		<ul style="list-style-type: none"> <li><del>• the layout of the scheme maximises the extent of active frontages onto public facing sides and, where appropriate, surrounds uses that have inactive frontages with uses that have active frontages to engender street-based activity and provide a sense of safety</del></li> <li><del>• the experience of arrival, via footpaths, entrances and shared circulation spaces is comfortable, accessible and fit for purpose</del></li> <li><del>• communal open spaces provide sufficient space, are easily accessed from all related dwellings and are designed to support an appropriate balance of informal social activity and play opportunities for various age groups</del></li> <li><del>• the private amenity space for each dwelling is usable and has a balance of</del></li> </ul>		
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		<p><del>openness and protection, appropriate for its outlook and orientation</del></p> <ul style="list-style-type: none"> <li><del>• outdoor spaces are located to be appreciated from inside, and internal spaces are able to take advantage of good weather and designed to achieve ease of access to external spaces</del></li> <li><del>• blocks and floorplans are orientated to optimise opportunities for visual interest through a range of immediate and longer range views, with the views from individual dwellings considered at an early design stage</del></li> <li><del>• the dwellings and outside spaces are fit for purpose and comfortable</del></li> <li><del>• the dwellings and outside spaces are able to be easily adapted to meet the changing and diverse needs of different occupiers over their lifetimes</del></li> </ul>		
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		<ul style="list-style-type: none"> <li><del>• window cleaning and other basic cleaning and maintenance activities can be carried out by residents easily</del></li> <li><del>• the site layout, common parts, design of individual units and buildings, and orientation of rooms and windows provide privacy and adequate daylight for all residents, as well as clear and convenient routes with a feeling of safety</del></li> <li><del>• the design or the layout and orientation helps reduce noise from common areas to individual dwellings</del></li> <li><del>• the design of developments, and orientation and layout of individual dwellings and common spaces helps meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters</del></li> <li><del>• sufficient level, secure and convenient externally accessible</del></li> </ul>		
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		<del>storage is provided for cycles, deliveries, and other bulky items</del> <del>• recycling and waste disposal facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services<sup>26</sup>.</del>		
MSC.3.59	D4 Table 3.2	<i>Insert new Table 3.2 – See Appendix</i>  <b>Table 3.2 Qualitative design aspects to be addressed in housing developments</b>	London Boroughs, London Waste and Recycling Board, Monks Orchard Residents Association, Mubin Trust for London	Clarification
MSC.3.60	D5 A 1	A To provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children,	Age UK London, Alzheimer’s Society, Aspire, Habinteg, Hammersmith and Fulham Disability Forum, London	Clarification

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		<p>residential development must ensure that:</p> <p>1) at least 10 per cent of new build dwellings <b>(which are created via works to which Part M volume 1 of the Building Regulations applies)</b> meet Building Regulation requirement M4(3) 'wheelchair user dwellings', <del>i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users</del></p>	Boroughs, IDaAP, The Access Association, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, Retirement Lifestyles Ltd., Liam Proudlock	
MSC.3.61	D5 A 2	A To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:	Age UK London, Alzheimer's Society, Aspire, Habinteg, Hammersmith and Fulham Disability Forum, London	

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		2) all other <del>new-build</del> dwellings <b>(which are created via works to which Part M volume 1 of the Building Regulations applies)</b> meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.	Boroughs, IDaAP, The Access Association	
MSC.3.62	D5 Paragraph 3.5.1 Footnote 27 and 27A	3.5.1 Many households in London <del>already</del> require <b>accessible or adapted housing</b> to lead dignified and independent lives <sup>27</sup> . <b>In addition, More</b> Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving due to inaccessible accommodation. To address these and future needs, <u>Policy D5 Accessible housing</u> should apply to all <del>new-build</del> dwellings <b>which are</b>	Age UK London, LB Ealing, Alzheimer's Society, Aspire, Habinteg, Hammersmith and Fulham Disability Forum, LB Brent, LB Haringey, LB Barnet  IDaAP, The Access Association	Clarification



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		<p><b>created via works to which Part M volume 1 of the Building Regulations applies<sup>27A</sup>, which, at the time of publication of this Plan generally limits the application of this policy to new build dwellings.</b></p> <p><i>Delete footnote 27 and insert new footnote 27A</i></p> <p><del><sup>27</sup>—Source English Housing Survey</del></p> <p><b><sup>27A</sup> This is governed by the statutory instruments; No. 2214 Building and Buildings, England and Wales, and The Building Regulations 2010, <a href="http://www.legislation.gov.uk/uksi/2010/2214/pdfs/uksi_20102214_en.pdf">http://www.legislation.gov.uk/uksi/2010/2214/pdfs/uksi_20102214_en.pdf</a> and No. 767 Building and Buildings, England and Wales The Building Regulations &amp;c. (Amendment) Regulations 2015 <a href="http://www.legislation.gov.uk/uksi/2015/767/pdfs/uksi_20150767_en.pdf">http://www.legislation.gov.uk/uksi/2015/767/pdfs/uksi_20150767_en.pdf</a>.</b></p>		
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MSC.3.63	D5 Paragraph 3.5.2	3.5.2 ..... to ensure that people can visit their neighbours with ease and are not limited by the design of communal areas. <b>For residential disabled persons parking requirements- see Policy T6.1 Residential parking.</b>	The Access Association	Clarification and Consistency
MSC.3.64	D5 Paragraph 3.5.6	3.5.6 In exceptional circumstances, the provision of a lift to dwelling entrances may not be achievable. In the following circumstances and <b>only</b> in blocks of four storeys or less, it may be necessary to apply some flexibility in the application of this policy: <ul style="list-style-type: none"> <li>• Specific small-scale infill developments (see <u>Policy H2 Small sites</u>)</li> <li>• Flats above existing shops or garages <del>stacked maisonettes where</del></li> </ul>	Just Space, IDaP, Centre for Accessible Environments, The Access Association, Trust for London, Levitt Bernstein	Clarification

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		<p><del>the potential for decked access to the lift is restricted</del></p> <ul style="list-style-type: none"> <li>• <b>Stacked maisonettes where the potential for decked access to lifts is restricted</b></li> <li>• <del>Blocks where the implications of ongoing maintenance costs on the affordability of service charges for residents will be prohibitive.</del></li> </ul>		
MSC.3.65	D5 Paragraph 3.5.8	<p>3.5.8 .....Planning conditions should specify:</p> <ul style="list-style-type: none"> <li>• Number of dwellings per size typology (i.e. x no. of y bed units) which <del>required to meet M4(2)</del> <b>must comply with Part M4(2)</b></li> <li>• Number of dwellings per size typology (i.e. x no. of y bed units) which <del>are required to meet M4(3) wheelchair accessible standards</del></li> </ul>	LB Camden, Hammersmith and Fulham Disability Forum	Clarification

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		<p><b>must comply with Part M4(3)(2)(a) wheelchair adaptable standards.</b></p> <ul style="list-style-type: none"> <li>Number of dwellings per size typology (i.e. x no. of y bed units) which <del>are required to meet M4(3) wheelchair adaptable standards</del> <b>must comply with Part M4(3)(2) wheelchair accessible standards.</b></li> </ul>		
MSC.3.66	D6 Title	<b>Policy D6 Optimising housing density</b>	Levitt Bernstein, The British Library	Clarification
MSC.3.67	D6 A	A Development <del>proposals</del> must make the most efficient use of land and be <del>developed</del> <b>designed</b> at the optimum density. The <del>optimum density</del> <b>processes required by parts A and B of a development should result from Policy D2 Delivering good design set out how</b> a design-led approach <del>to</del>	Levitt Bernstein	Clarification

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		<del>determine will inform</del> the <b>evaluation of a site's context and help to identify its</b> capacity <del>of the site for</del> <b>growth</b> . Particular consideration should be given <b>to the following evaluation criteria to determine optimal development density:</b>		
MSC.3.68	D6 A 1	A .....Particular consideration should be given to the following evaluation criteria to determine optimal development density:  1) the site context, <b>including surrounding built form, uses and character;</b>	Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond Individuals	Clarification
MSC.3.69	D6 A 2 New footnote 28A	A .....Particular consideration should be given to the following evaluation criteria to determine optimal development density:	HTA Design	Clarification

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		<p>2) <del>its</del> <b>the site's</b> connectivity and accessibility by walking, <del>and</del> cycling, and existing and planned public transport <b>to jobs and services</b> (including <b>both</b> PTAL <b>and access to local services</b><sup>28A</sup>);</p> <p><i>Insert new footnote 28A</i></p> <p><b><sup>28A</sup> Time Mapping (TIM) catchment analysis is available on TfL's WebCAT webpage and provides data showing access to employment, town centres, health services, and educational establishments as well as displaying the population catchment for a given point in London (see PTAL in glossary for more information on WebCAT and Time Mapping).</b></p>		
MSC.3.70	D6 A 3	A .....Particular consideration should be given to the following evaluation criteria	Kingston & Surbiton Constituency Labour Party, London Councils,	Clarification

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		to determine optimal development density:  3) the capacity of surrounding infrastructure <b>(see Part B)</b>	LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd	
MSC.3.71	D6 A (end paragraph)	<i>Moved to new clause EA</i>  A .....Particular consideration should be given to the following evaluation criteria to determine optimal development density:  <del>Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.</del>	Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond  Individuals	Clarification

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MSC.3.72	D6 B	B <b>In preparing Development Plans and area based strategies, boroughs should follow the approach set out in part A to determine the capacity of allocated sites.</b> The capacity of existing and planned physical, environmental and social infrastructure to support new development <b>proposed by Development Plans</b> should be assessed and, where necessary, improvements to infrastructure capacity should be planned <b>in infrastructure delivery plans or programmes</b> to support growth.	Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd	Clarification
MSC.3.73	D6 B 2	B .....and, where necessary, improvements to infrastructure capacity should be planned <b>in infrastructure delivery plans or programmes</b> to support growth.	Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One	Clarification



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		2) The ability to support <del>proposed</del> <b>higher densities</b> through encouraging <b>increased levels of</b> active travel should be taken into account.	Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd	
MSC.3.74	D6 B 3	<p>B .....and, where necessary, improvements to infrastructure capacity should be planned <b>in infrastructure delivery plans or programmes</b> to support growth.</p> <p>3) Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, <del>in exceptional circumstances,</del> that <b>if the</b></p>	Alona Sherman, Liam Kelly, Claire Mellish, Paul McQuillen, Paul Stansfield, Robert Gurd, Simon Saville, The Hammersmith Society, Just Space, CPRE, Hornsey & Wood Green Labour Party, GLA Green Party Group	Clarification

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		development is contingent on the provision of <del>the necessary new</del> infrastructure, <del>and including</del> public transport services, <del>and it will be</del> <b>appropriate</b> that the development is phased accordingly.		
MSC.3.75	D6 B 3A	<p>B .....and, where necessary, improvements to infrastructure capacity should be planned <b>in infrastructure delivery plans or programmes</b> to support growth.</p> <p><b>3A) When a proposed development exceeds the capacity identified in a local site allocation or the site is not allocated, and the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified</b></p>	Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd	Clarification

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		<b>through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and CIL contribution that the development will make.</b>		
MSC.3.76	Policy D6 C	C The higher the density of a development, the greater the level of scrutiny that is required of its design. <b>For residential development it is particularly important to scrutinise</b> the qualitative aspects of the development design described in <u>Policy D4 Housing quality and standards</u> , and <del>the its</del> proposed ongoing management. Development proposals <del>with a residential component</del> that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of <u>Policy D2 Delivering</u>	Levitt Bernstein, The British Library	Clarification

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		<u>good design</u> and <b>those with a residential component must</b> submit a management plan if the proposed density is above:		
MSC.3.77	D6 D	D The following measure <b>ments</b> of density should be provided for all planning applications that include new residential units:		Readability
MSC.3.78	D6 E	E The following additional measure <b>ments</b> should be provided for all major planning applications:		
MSC.3.79	D6 E (end of Policy)	E ...should be provided for all major planning applications: ... <del>These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.</del>	Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond Individuals	Clarification and consistency with A 1
MSC.3.80	D6 EA	<b>EA Proposed development that does not demonstrably optimise the density of</b>		Readability

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		<b>the site in accordance with this policy should be refused.</b>		
MSC.3.81	D6 Paragraph 3.6.1	3.6.1 For London to accommodate <b>the</b> growth <b>identified in this Plan</b> in an inclusive and responsible way every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites. The design of the development must <b>optimise housing density.</b>	Levitt Bernstein, The British Library	Clarification
MSC.3.82	D6 Paragraph 3.6.1A	<b>3.6.1A</b> A design-led approach to optimising density should be based on an evaluation of the site's attributes, its surrounding context and <b>its</b> capacity for growth <del>and the most appropriate development form, which are determined by following the process set out in <u>Policy D2 Delivering good design</u>, <u>Policy H1 Increasing housing supply</u>, <u>Policy H2 Small sites</u> and <u>Policy H3</u></del>	Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond  Individuals	Clarification

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		<p><del>Monitoring housing targets set out requirements for increasing housing supply across London and identify locations where increased housing capacity can be achieved.</del> <b>Policy D1 London's form and characteristic and Policy D2 Delivering good design support the application of the design-led approach to optimising density. Policy D1 sets out design principles and physical characteristics that new development should deliver. Policy D2 parts A and B require the evaluation of the current characteristics of an area, including its infrastructure, and using this evaluation of evidence to establish what the most appropriate form of development is for an area in terms of scale, height, density, layout and</b></p>		
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		<b>land use, to create places which meet the requirements of Policy D1. The Mayor will provide further guidance on assessing site capacity and optimising density through a design led approach.</b>		
MSC.3.83	D6 Paragraph 3.6.2	<b>3.6.2 Infrastructure <del>assessments</del> provision</b> should be proportionate to the scale of <del>the</del> development. <b>The locations and scale of growth will be identified through boroughs' Development Plans, particularly through site allocations. Infrastructure capacity, having regard to the growth identified in the Development Plan, should be identified in boroughs' infrastructure delivery plans or programmes.</b>	Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield), Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd	Clarification
MSC.3.84	D6	<b>3.6.2A If developments come forward with capacities in excess of those</b>	Kingston & Surbiton Constituency Labour	Clarification

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	Paragraph 3.6.2A	<b>allocated in the relevant Development Plan, and therefore in excess of future planned infrastructure, a site-specific infrastructure assessment will be required. This assessment should establish what additional impact the proposed development will have on current and planned infrastructure, and how this can be appropriately mitigated either on the site, or through an off-site mechanism, having regard to the amount of CIL generated.</b>	Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd	
MSC.3.85	D6 Paragraph 3.6.3	3.6.3 <del>The surrounding infrastructure of all types is a key element in determining the optimum density of a site.</del> The <b>capacity of existing and future public transport services</b> , and the connections they provide, should be taken into consideration.....	Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group,	Clarification and consistency.



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			Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd	
MSC.3.86	D6 Paragraph 3.6.3A	<b>3.6.3A</b> <del>3.6.2</del> Minor developments will typically have incremental impacts on local infrastructure capacity. <b>The cumulative demands on infrastructure of minor development</b> which should be addressed in boroughs <del>infrastructure</del> <del>delivery</del> <del>Plans</del> <b>or programme.</b>	Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd	Clarification
MSC.3.87	D6 Paragraph 3.6.4	3.6.4 ..... In many areas of London higher densities could be supported by maximising the potential of active	Alona Sherman, Liam Kelly, Claire Mellish, Paul McQuillen, Paul	Clarification

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		travel. Those <b>exceptional limited</b> circumstances for which part B3 of the policy could apply include development being brought forward in areas where planned public transport schemes will significantly improve accessibility and capacity of an area, such as Crossrail 2, DLR extensions, extension of the Elizabeth Line, and the Bakerloo Line Extension	Stansfield, Robert Gurd, Simon Saville, The Hammersmith Society, Just Space, CPRE, Hornsey & Wood Green Labour Party, GLA Green Party Group	
MSC.3.88	D6 Paragraph 3.6.7	3.6.7 The proposed design and management of the developments should be thoroughly scrutinised during the planning process. <b>Residential portions should be scrutinised</b> in line with part C of <u>Policy D6 Optimising housing density</u> . The higher the density of a development the greater this <b>scrutiny</b> should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. This is important because	Levitt Bernstein, The British Library	Clarification

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		these elements of the development come under more pressure as the density increases. The housing minimum space standards set out in <u>Policy D4 Housing quality and standards</u> help ensure that as densities increase, <del>the</del> quality of internal residential units is maintained.		
MSC.3.89	D6 Paragraph 3.6.8	3.6.8 <b>To ensure servicing and day to day management of residential developments have been considered in designing higher density development the Mmanagement plans</b> required to be submitted with higher density development proposal <b>by part C of this policy</b> , must include details of day-to-day servicing and deliveries, and longer-term maintenance implications.	The Highbury Group	For clarity.
MSC.3.90	D6 Paragraph 3.6.10	3.6.10 ..... Density measures related to the residential population (part D of <u>Policy D6 Optimising <del>housing</del> density</u> ) will be	Levitt Bernstein, The British Library	Consistency

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		relevant for infrastructure provision, while measures of density related to the built form and massing (part E of <u>Policy D6 Optimising <del>housing</del> density</u> ) will inform its integration with the surrounding context.		
MSC.3.91	D7 A - M	<p>Development Plans and development proposals should:</p> <p>A <del>E</del><b>e</b>nsure the public realm is .....</p> <p>B <del>M</del><b>m</b>aximise the contribution that.....</p> <p>C <del>B</del><b>b</b>e based on an understanding of...</p> <p>D <del>E</del><b>e</b>nsure both the movement.....</p> <p>E <del>E</del><b>e</b>nsure there is a mutually .....</p> <p>F <del>E</del><b>e</b>nsure buildings are of .....</p> <p>G <del>E</del><b>e</b>nsure appropriate .....</p> <p>H <del>I</del><b>i</b>ncorporate green .....</p> <p>I <del>E</del><b>e</b>nsure that <b>appropriate</b> shade....</p> <p>J <del>E</del><b>e</b>xplore opportunities for.....</p> <p>K <del>C</del><b>c</b>reate an engaging public.....</p>		Consistency

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		L <del>E</del> nsure that <b>any</b> on-street..... M <del>E</del> nsure the provision and .....		
MSC.3.92	D7 A	A <del>E</del> nsure the public realm is <b>well-designed</b> , safe, accessible, inclusive, attractive, well-connected, <b>related to the local and historic context, and</b> easy to understand, <b>service</b> and maintain. <b>Landscape treatment</b> , <del>and that it relates to the local and historic context, and incorporates the highest quality design, landscaping,</del> planting, street furniture and surfaces <b>materials should be of good quality, fit-for-purpose, durable and sustainable.</b>	London Boroughs, Businesses, Agents	Clarification and Readability
MSC.3.93	D7 C	C ..... In particular, they should demonstrate an understanding <b>of how people use the public realm, and</b> the types, location and relationship between public spaces in an area, identifying where there are deficits for	London Assembly Planning Committee	Clarification

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		certain activities, or barriers to movement that create severance for pedestrians and cyclists.		
MSC.3.94	D7 D	D ..... The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, <b>which should be regular, convenient and accessible.</b>	London Boroughs, Businesses, Campaign Group	Clarification
MSC.3.95	D7 H	H <del>h</del> incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, <b>moderate surface and air temperature</b> <del>manage heat</del> and increase biodiversity.	RB Kingston	Clarification
MSC.3.96	D7 I	I <del>E</del> nsure that <b>appropriate</b> shade, <del>and</del> shelter <b>and seating</b> are provided <del>with</del>	London Boroughs, Businesses	Clarification

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		<p><del>appropriate types and amounts of seating</del> to encourage people to spend time in a place., <del>where appropriate.</del> This should be done in conjunction with the removal of <del>any unnecessary or dysfunctional</del> clutter, <b>including or</b> street furniture <b>that is poorly located, unsightly, in poor condition or without a clear function,</b> to ensure <del>that the function of the space and</del> pedestrian amenity is improved. <b>Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space.</b> Applications which seek to introduce unnecessary street furniture should <del>normally</del> be refused.</p>	Agents, Professional Body	
MSC.3.97	D7 J	J <del>E</del> explore opportunities for innovative approaches to improving the public	Individuals	Clarification

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		realm such as open street events <b>and Play Streets.</b>		
MSC.3.98	D7 K	K <del>C</del> create an engaging public realm for people of all ages, with opportunities for <b>social activities</b> , formal and informal play and social <b>interaction activities</b> during the daytime, evening and at night.	LB Islington	Clarification
MSC.3.99	D7 L	L <del>E</del> ensure that <b>any</b> on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. <b>Parking should not obstruct pedestrian lines.</b> <del>Pedestrian crossings should be regular, convenient and accessible.</del>	London Boroughs, Businesses	Clarification
MSC.3.100	D7 M	M <del>E</del> ensure the provision and future management of free drinking water at appropriate locations in <b>the new or</b>	London Forum of Amenity and Civic Societies	Clarification



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		<del>redeveloped</del> public realm, <b>including where new public realm is provided.</b>		
MSC.3.101	D7 Paragraph 3.7.1	3.7.1 The <b>public realm</b> includes all the publicly-accessible space...		Correction
MSC.3.102	D7 Paragraph 3.7.1	3.7.1..... Some internal or elevated spaces can also be considered as part of the public realm, such as <b>markets</b> , shopping malls, sky gardens, viewing platforms, museums or station concourses...	London Forum of Amenity and Civic Societies	Clarification
MSC.3.103	D7 Paragraph 3.7.2	3.7.2...For this reason, the public realm, and the buildings that frame those spaces, should be <b>designed for people</b> , <del>multi-functional</del> , attractive, accessible and contribute to the highest possible standards of comfort, good acoustic design, security and ease of movement.	Levitt Bernstein	Clarification

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MSC.3.104	D7 Paragraph 3.7.3	3.7.3...The remaining streets are places which function as key centres for leisure, shopping, <b>culture, social interaction</b> and accessing services and employment, such as high streets or public squares.		Clarification
MSC.3.105	D7 Paragraph 3.7.4	3.7.4 The specific balance between the different functions of any one space, such as its place-based activities, <del>and</del> its function to facilitate movement <b>and its ability to accommodate different uses of the kerbside</b> , should be at the heart of how the space is designed and managed...	Centre for London	Clarification
MSC.3.106	D7 Paragraph 3.7.6	3.7.6 ...The opportunity to incorporate these uses should be identified and facilitated through <b>community engagement</b> , careful design and good acoustic design.		Clarification

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MSC.3.107	D7 Paragraph 3.7.11	3.7.11 The provision of <b>accessible free drinking water</b> fountains helps improve public health, reduces waste from single-use plastic bottles and supports the circular economy through the use of reusable water bottles...		Clarification
MSC.3.108	D8 Introduction	<del>Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:</del>	Individuals, Historic England, London Assembly Planning Committee	Clarification and Consistency within Plan
MSC.3.109	D8 A	<b>Definition</b>		Clarification

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		A Based on local context, Development Plans should define what is considered a tall building <b>for specific localities</b> , the height of which <del>will may</del> vary <b>between and with</b> in different parts of London.		
MSC.3.110	D8 B	<del>Tall building</del> <b>Locations</b> B Tall buildings should <b>only</b> be <b>developed in sustainable locations that are identified in Development Plans</b> <del>part of a plan-led approach to changing or developing an area.</del> <b>By following the processes required in parts A, B and C of Policy D2 Delivering good design</b> boroughs should <b>determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other</b>	London Boroughs, Businesses, Historic England, London Assembly Planning Committee	Clarification

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		<p><b>requirements of the Plan. Boroughs should</b> identify <b>any such locations</b> on maps in Development Plans <del>the locations where tall buildings will be an appropriate form of development in principle,</del> and should indicate the general building heights that would be appropriate <b>in these locations</b>, taking account of:</p>		
MSC.3.111	D8 B	<p><i>Insert new paragraph under D8 B 3)</i></p> <p>B Tall buildings should only be developed in sustainable locations that are identified in Development Plans.....</p> <p>3) the public transport connectivity of different locations.</p> <p><b>This process should include engagement with neighbouring</b></p>	LB Islington, Historic England	Clarification

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		<b>boroughs that may be affected by tall building developments in identified locations.</b>		
MSC.3.112	D8 C 1 - 4	<p>C The impacts of a tall building can be visual, functional or environmental.....</p> <p>1) <del>V</del><b>v</b>visual impacts</p> <p>a) <del>T</del><b>t</b>he views of .....</p> <p>i <del>L</del><b>l</b>ong-range views .....</p> <p>ii <del>M</del><b>m</b>id-range views .....</p> <p>iii <del>I</del><b>i</b>mmEDIATE views.....</p> <p>b) <del>W</del><b>w</b>hether part of a .....</p> <p>c) <del>A</del><b>a</b>rchitectural quality .....</p> <p>d) <del>P</del><b>p</b>roposals should take .....</p> <p>e) <del>B</del><b>b</b>uildings in the .....</p> <p>f) <del>B</del><b>b</b>uildings near the River.....</p> <p>g) <del>B</del><b>b</b>uildings should not .....</p>		Correction

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		<p>2 ) <del>T</del><b>F</b>unctional impact</p> <p>a) <del>T</del><b>t</b>he internal and .....</p> <p>b) <del>B</del><b>B</b>uildings should .....</p> <p>c) <del>E</del><b>E</b>ntrances, access routes, .....</p> <p>d) <del>h</del><b>i</b>t must be demonstrated .....</p> <p>e) <del>h</del><b>i</b>nfrastructure improvements</p> <p>f) <del>J</del><b>J</b>obs, services, .....</p> <p>g) <del>B</del><b>B</b>uildings, including .....</p> <p>3) <del>E</del><b>E</b>nvironmental impact</p> <p>a) <del>W</del><b>w</b>ind, daylight, sunlight....</p> <p>b) <del>A</del><b>A</b>ir movement affected.....</p> <p>c) <del>N</del><b>N</b>oise created by air.....</p> <p>4) <del>C</del><b>C</b>umulative impacts</p> <p>a) <del>T</del><b>t</b>he cumulative visual.....</p>		
MSC.3.113	D8 C	<b>Impacts</b>	Historic Royal Palaces,	Clarification

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		C The impacts of a tall building can be visual, functional or environmental. All <b>the following impacts</b> <del>three elements</del> should be <del>considered</del> <b>addressed</b> within plan-making and in <del>deciding</del> development proposals:	London Assembly Planning Committee	
MSC.3.114	D8 C 1 a)	<b>Impacts</b> C .....should be <del>considered</del> <b>addressed</b> within plan-making and in <del>deciding</del> development proposals: 1) <del>V</del> <b>v</b> visual impacts a) <del>T</del> <b>t</b> he views of buildings from different distances: <del>need to be considered,</del> <b>including</b>		
MSC.3.115	D8 C 1 e	<b>Impacts</b> C .....should be <del>considered</del> <b>addressed</b> within plan-making and in <del>deciding</del> development proposals: 1) <del>V</del> <b>v</b> visual impacts	Historic Royal Palaces, Historic England	Clarification



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		e) Buildings in the setting of a World Heritage Site must preserve, <b>and not harm</b> , the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it		
MSC.3.116	D8 C 1 f	<p><b>Impacts</b></p> <p>C .....should be <del>considered</del><b>addressed</b> within plan-making and in <del>deciding</del> development proposals:</p> <p>1)<del>v</del>visual impacts</p> <p>f) Buildings near the River Thames, particularly in the Thames Policy Area, should <b>protect and enhance the open quality of the river and the riverside public realm, including views, and</b> not contribute to a canyon effect along the river <del>which encloses the open aspect of the river and the riverside</del></p>	Historic England, London Assembly Planning Committee	Clarification

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		<del>public realm, or adversely affect strategic or local views along the river</del>		
MSC.3.117	D8 C 2 e	<p>C .....should be <del>considered</del><b>addressed</b> within plan-making and in <del>deciding</del> development proposals:</p> <p>2) <del>F</del><b>functional</b> impact</p> <p>e) <del>I</del><b>nfrastructure</b> improvements required as a result of the development should be delivered and phased appropriately <b>(see also Policy D6 Optimising density)</b></p>	The Putney Society	Clarification
MSC.3.118	D8 D	<p>D <b>Free to enter P</b>ublicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where <b>they should normally be located at the top of the building to afford wider views across London.</b></p>	City of London Corporation	Clarification

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MSC.3.119	D8 Paragraph 3.8.1	3.8.1 Whilst high density does not need to imply high rise, <b>tall buildings</b> can form part of a <b>strategic-plan-led</b> approach to <b>facilitating regeneration opportunities and meeting-managing future growth</b> , <del>regeneration and economic development goals</del> , particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities.	London Boroughs	Clarification
MSC.3.120	D8 Paragraph 3.8.1	3.8.1 .....Tall buildings that are of exemplary architectural quality, <b>in the right place</b> , can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. impacts if in inappropriate locations and/or of poor quality design. The processes set out in <u>Policy D2</u>	London Boroughs	Clarification

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		<u>Delivering good design</u> will enable boroughs to identify <del>locations-areas</del> where tall buildings can play a positive role in shaping the character of an area.		
MSC.3.121	D8 Paragraph 3.8.2	3.8.2 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. <b>Boroughs should define what is a 'tall building' for specific localities.</b> In large areas of extensive change, such as Opportunity Areas, <b>the threshold for what constitutes a definitions-of</b> tall buildings should relate to the evolving <b>(not just the existing)</b> context. <b>This policy applies to tall buildings as defined by the borough. Where there is no local definition, the policy applies to buildings over 25m in height in the Thames Policy Area,</b>	Individuals, Businesses, London Boroughs	Clarification

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		<p><b>and over 30m in height elsewhere in London.</b> <del>For the purpose of assessing applications referable to the Mayor, a tall building is a development that meets one or more of the following descriptions:</del></p> <ul style="list-style-type: none"> <li><del>• Located within the Thames Policy Area and over 25m in height; or it falls within the Thames Policy Area and is more than 25m in height</del></li> <li><del>• Located anywhere it falls anywhere else within the City of London and is more than 150m in height</del></li> <li><del>• Located elsewhere in London and over it is more than 30m in height. elsewhere in London.</del></li> </ul>		
MSC.3.122	D8 3.8.2A	<b>3.8.2A The higher the building the greater the level of scrutiny that is required of its design. In addition, tall buildings that are referable to the</b>	London Boroughs, Businesses, Historic England	Clarification

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		<b>Mayor, must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design.</b>		
MSC.3.123	D8 Paragraph 3.8.7	3.8.7 Any <b>external lighting</b> for tall buildings should be energy efficient, and designed to minimise glare, light trespass, and sky glow, and ensure it does not negatively impact on <b>protected views or</b> the amenity of nearby residents.	London Forum of Amenity Society, Individuals	Clarification
MSC.3.124	D9 A	A Boroughs, <del>particularly in inner London,</del> should establish policies to address the negative impacts of large-scale basement development beneath existing buildings.	Community Groups	Clarification
MSC.3.125	D9 Paragraphs 3.9.2 and 3.9.3	<i>3.9.2 moved to end of section</i> <i>3.9.3 moved to end of section</i>		Readability

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MSC.3.126	D9 Paragraph 3.9.4	3.9.4 The construction of basements can, <del>however,</del> cause significant disturbance and disruption if not managed effectively, especially where there are cumulative impacts from a concentration of subterranean developments....		Clarification
MSC.3.127	D9 Paragraph 3.9.5	3.9.5 The Mayor supports boroughs in <b>restricting large-scale basement excavations</b> under existing properties where this type of development is likely to cause unacceptable harm. Local authorities are advised to consider the following issues, <b>including any cumulative impacts</b> , alongside other relevant local circumstances when developing their own policies for basement developments:	LB Islington	Clarification
MSC.3.128	D9 Paragraph 3.9.5A	<del>3.9.5A-3.9.2</del> Most proposals for the construction of a basement will require	Community Groups	Clarification

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		planning permission. These proposals need to be managed sensitively through the planning application process to ensure that their potential impact on the local environment and residential amenity is acceptable. <del>Where basement developments cause particular harm, boroughs can consider introducing Article 4 Directions to require smaller-scale proposals to obtain planning permission.</del>		
MSC.3.129	D9 Paragraph 3.9.5B	<del>3.9.5B-3.9.3</del> The Mayor considers that <b>smaller-scale basement excavations</b> , where they are appropriately designed and constructed, can contribute to the efficient use of land., <del>and They can provide an affordable option for families to provide</del> extra living space without the costs of moving house., <del>although these developments rarely result in the provision of additional residential units</del>	LB Hammersmith and Fulham, Levitt Bernstein	Clarification



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		<del>to help meet London's housing need. In areas w</del> here basement developments <b>could</b> cause particular harm, boroughs can consider introducing <b>Article 4 Directions</b> to require smaller-scale proposals to obtain planning permission.		
MSC.3.130	D10 A	A Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment <b>and reduce the fear of crime.</b>	Metropolitan Police Service	Clarification

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MSC.3.131	D10 Paragraph 3.10.2	3.10.2 New developments, including building refurbishments, should be constructed with resilience at the heart of their design. In particular they should incorporate appropriate <b>fire safety</b> solutions and represent best practice in fire safety planning in both design and management. The <del>London Fire and Emergency Planning Authority (LFEPA)</del> <b>London Fire Commissioner</b> should be consulted early in the design process to ensure major developments have fire safety solutions built-in. Flooding issues and designing out the effects of flooding are addressed in Chapter 9.		Update
MSC.3.132	D10 Paragraph 3.10.3 New footnote 30A	3.10.3 Measures to <b>design out crime</b> , including counter terrorism measures, should be integral to development proposals and considered early in the design process, <b>taking into account the principles contained in guidance</b>	Metropolitan Police Service	Clarification

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		<p><b>such as the Secured by Design Scheme<sup>30A</sup> published by the Police. Further guidance is provided by Government on security design<sup>31</sup>.</b></p> <p>This will ensure <b>development proposals</b> <del>they</del> provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.</p> <p><i>Insert new footnote 30A</i></p> <p><b>For further details see <a href="http://www.securedbydesign.com">http://www.securedbydesign.com</a></b></p>		
MSC.3.133	D10 Paragraph 3.10.4	3.10.4 <b>By drawing upon current Counter Terrorism principles, <del>N</del>new</b> development, including streetscapes	Metropolitan Police Service	Clarification

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		<p>and public spaces, should incorporate elements that deter terrorists, maximise the probability of <b>their detection</b> <del>detecting intrusion</del>, and delay/<b>disrupt their activity until an appropriate response can be deployed</b> <del>any attempts at disruption until a response can be activated</del>. Consideration should be given to <b>physical, personnel and electronic security</b> (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which <b>mitigate</b> <del>respond to</del> the potential level</p>		
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		of risk whilst ensuring the quality of places is maximised.		
MSC.3.134	D11 A 1A	<p>A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:</p> <p><b>1A) identify suitably positioned unobstructed outside space:</b></p> <p><b>a) for fire appliances to be positioned on</b></p> <p><b>b) appropriate for use as an evacuation assembly point</b></p>	London Fire and Emergency Planning Authority	Clarification
MSC.3.135	D11 A 1	<p>A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:</p> <p>1) are designed to incorporate appropriate features which reduce the risk to life <b>and</b></p>	Peter Eversden	Clarification

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		<b>of serious injury</b> in the event of a fire; <b>including appropriate fire alarm systems, passive and active fire safety measures</b>		
MSC.3.136	D11 A 3	A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:  3) provide suitable and convenient means of escape, <b>and associated evacuation strategy</b> for all building users		
MSC.3.137	Policy D11 A 5) (previously 4)	A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:	Peter Eversden Green Party Group London Forum of Amenity and Civic Societies	Clarification

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		4) <del>adopt</del> <b>develop</b> a robust strategy for evacuation which <b>can be periodically updated and published, and which</b> all building users can have confidence in		
MSC.3.138	D11 B 1	B ..... The statement should detail how the development proposal will function in terms of:  1) the building's construction: methods, products and materials used, <b>including manufacturers details</b>	Peter Eversden Christopher Barlow	Clarification
MSC.3.139	D11 B 2	B ..... The statement should detail how the development proposal will function in terms of:  2) the means of escape for all building users: <b>suitably designed</b> stair cores, escape for building users who are disabled or require level access, <del>and</del>	Peter Eversden	Clarification

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		<del>the associated management plan approach and associated evacuation strategy approach</del>		
MSC.3.140	D11 B 2A	B ..... The statement should detail how the development proposal will function in terms of:  <b>2A) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans</b>	Peter Eversden	Clarification and consistency with B 2
MSC.3.141	D11 B 4	B ..... The statement should detail how the development proposal will function in terms of:  4) how provision will be made within the <b>curtilage of the</b> site to enable fire appliances to gain access to the building	London Fire and Emergency Planning Authority	Clarification



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MSC.3.142	D11 B 4A	B ..... The statement should detail how the development proposal will function in terms of:  <b>4A) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.</b>	London Forum of Amenity and Civic Societies, Green Party Group, Peter Eversden	Clarification
MSC.3.143	D11 Paragraph 3.11.2	3.11.2 The <del>subject matter of</del> <b>compliance</b> is covered by Part B of the Building Regulations. However to ensure that development proposals achieve the <b>highest standards of fire safety</b> , reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as	Gary Ferrand	Clarification

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		<p>a whole. <del>Developments, their floor layouts and cores need to be planned around issues of fire safety and a robust strategy for evacuation from the outset, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety.</del></p>		
MSC.3.144	D11 Paragraph 3.11.2A	<p><b>3.11.2A Applicants should demonstrate on a site plan that space has been identified for the appropriate positioning of fire appliances. These spaces should be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future.</b></p>	London Fire and Emergency Planning Authority, Boroughs, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, DP9, L&Q, Redrow Homes London Division, Barrat	Clarification

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			Developments Plc, London Property Alliance, Silvertown Homes, Royal London, Ilderton Road LLP, CIAT  London Councils, RICS, RTPI, HBF, Butler & Young Approved Inspectors Limited	
MSC.3.145	D11 Paragraph 3.11.2B	<b>3.11.2B Applicants should also show on a site plan appropriate evacuation assembly points. These spaces should be positioned to ensure the safety of people using them in an evacuation situation.</b>	London Fire and Emergency Planning Authority, Boroughs, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, DP9, L&Q, Redrow Homes London Division, Barrat Developments Plc, London Property	Clarification

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			Alliance, Silvertown Homes, Royal London, Ilderton Road LLP, CIAT, London Councils  RICS, RTPI, HBF, Butler & Young Approved Inspectors Limited	
MSC.3.146	D11 Paragraph 3.11.2C	<b>3.11.2C Developments, their floor layouts and cores need to be planned around issues of fire safety and a robust strategy for evacuation from the outset, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety. This is of particular importance in blocks</b>	London Fire and Emergency Planning Authority, Boroughs, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, DP9, L&Q, Redrow Homes London Division, Barrat Developments Plc, London Property Alliance, Silvertown Homes, Royal London,	Clarification

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		<b>of flats, as building users and residents may be less familiar with evacuation procedures.</b>	Ilderton Road LLP, CIAT, London Councils, RICS, RTPI, HBF, Butler & Young Approved Inspectors Limited	
MSC.3.147	D11 Paragraph 3.11.3A	<b>3.11.3A The provision of stair cores which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation should also be explored at an early stage and provided wherever possible.</b>	Gary Ferrand, Clarion Housing Group, LB Harrow	Clarification
MSC.3.148	D11 Paragraph 3.11.4	3.11.4 <u>Policy D3 Inclusive design</u> requires development to incorporate safe and dignified emergency evacuation for all building users, by as independent means as possible. <del>Where</del> <b>In all developments where</b> lifts are installed, <u>Policy D3 Inclusive design</u> requires <b>as</b> a minimum	The Access Association	Consistency with wording of D3

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		<p><del>of at least</del> one lift per core <b>(or more subject to capacity assessments)</b> to be a <b>suitably sized</b> fire evacuation lift <b>suitable to be used to evacuate people who require level access from the building.</b> <del>, which incorporate suitable levels of fire resistance to elements of construction forming refuges, evacuation lift enclosures, and lobbies.</del> <b>Fire evacuation lifts and associated provisions should be appropriately designed, constructed and should include the necessary controls suitable for the purposes intended.</b></p>		
MSC.3.149	D11 Paragraph 3.11.5	3.11.5 <b>Fire statements</b> should be submitted with all major development proposals. These should be produced by a third-party independent suitably-qualified assessor. This should be a qualified engineer with relevant experience in fire safety, such as a	LB Greenwich, LB Hackney, The Access Association, Christopher Barlow	Clarification

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		<p>chartered engineer registered with the Engineering Council by the Institution of Fire Engineers <b>or suitably qualified and competent with the demonstrable experience to address the complexity of the design being proposed / built, which should be evidenced in the fire statement.</b></p> <p>Planning departments <del>should</del> <b>could</b> work with and be assisted by suitably qualified and experienced officers within borough building control departments and/or the London Fire Brigade, in the evaluation of these statements.</p>		
MSC.3.150	D11 Paragraph 3.11.5A	<b>3.11.5A Security measures should not adversely impact on the means of escape nor prevent entry of the fire and rescue service.</b>	Metropolitan police service	Clarification
MSC.3.151	D12 A	A The Agent of Change principle places the responsibility for mitigating impacts from	Freight and Transport Association, UK	Clarification

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		existing noise <b>and other nuisance-</b> generating activities or uses on the proposed new noise-sensitive development.	Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	
MSC.3.152	D12 B	B Boroughs should ensure that development Boroughs should ensure that <b>Development Plans and</b> planning decisions reflect the Agent of Change.....	Home Builders Federation	Clarification



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MSC.3.153	D12 B	B ..... principle and take account of existing noise <b>and other nuisance</b> -generating uses in a sensitive manner when new development, <del>particularly residential,</del> is proposed nearby.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	Clarification
MSC.3.154	D12 C	<i>C moved</i>		Readability
MSC.3.155	D12 D	D Development should be designed to ensure that established noise <b>and other nuisance</b> -generating <del>venues uses</del> remain viable and can continue or grow without unreasonable restrictions being placed on them.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning	Clarification

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			Committee, Thames Water	
MSC.3.156	D12 E	E New noise <b>and other nuisance-</b> generating development, <del>such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues</del> proposed close to residential and other noise-sensitive <b>development uses</b> should put in place measures <del>such as soundproofing</del> to mitigate and manage any noise impacts for neighbouring residents and businesses.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	Clarification
MSC.3.157	D12 EA 1 (previously C1)	<i>Previous Part C 1</i> <b>C EA</b> Development proposals should manage noise and other potential nuisances by:  1) ensuring good <del>acoustic</del> design <del>to mitigate</del> s and <del>minimise</del> s existing and potential <b>nuisances impacts of noise</b>	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning	Clarification

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		generated by existing uses <b>and activities</b> located in the area	Committee, Thames Water	
MSC.3.158	D12 EA 2	<p><i>Previous Part C 2</i></p> <p><del>EA</del> Development proposals should manage noise and other potential nuisances by:</p> <p>2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions <b>including ongoing and future management of mitigation measures</b> secured through planning obligations.</p>	Freight and Transport Association, Tarmac, Cemtex UK, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	Clarification
MSC.3.159	D12 EA 3	<i>Previous Part C 3</i>	London Councils, Environment Agency, London Boroughs,	Clarification

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		<p><b>C EA</b> Development proposals should manage noise and other potential nuisances by:</p> <p>3) separating new noise-sensitive development where possible from existing noise-generating businesses <b>and uses</b> through distance, screening, internal layout, sound-proofing, <del>and</del> insulation and other acoustic design measures.</p>	London Assembly Planning Committee	
MSC.3.160	D12 F	<p><b>F</b> Boroughs should refuse development proposals that have not clearly demonstrated how noise <b>and other nuisances</b> will be mitigated and managed.</p>	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning	Clarification

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			Committee, Thames Water	
MSC.3.161	D12 Paragraph 3.12.1	3.12.1 For a long time, the responsibility for managing and <b>mitigating the impact of noise and other nuisances</b> on neighbouring residents and businesses has been placed on the business or activity making the noise <b>or other nuisance</b> , regardless of how long the <del>noise-generating</del> business or activity has been operating in the area. In many cases, this has led to newly-arrived residents complaining about noise <b>and other nuisances</b> from existing businesses <b>or activities</b> , sometimes forcing the businesses <b>or other activities</b> to close- <del>down</del> .	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	Clarification
MSC.3.162	D12	3.12.2 The <b>Agent of Change principle</b> places the responsibility for mitigating	Freight and Transport Association, UK	Clarification

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	Paragraph 3.12.2	<p>the impact of noise <b>and other nuisances</b> firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, <b>for example</b>, applicants will need to design them in a more sensitive way to protect the new occupiers, such as new residents, businesses, schools and religious institutions, from noise <b>and other</b> impacts. This could include paying for soundproofing for the existing <del>noise-generating</del> uses, such as an <del>existing</del> music venue. The Agent of Change principle works both ways. <b>For example</b>, <del>if</del> a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or</p>	Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water	
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		activity is designed to protect existing users or residents from noise impacts.		
MSC.3.163	D12 Paragraph 3.12.3 Footnote 32	<p>3.12.3 The Agent of Change principle is included in the National Planning Policy Framework <del>at paragraph 123</del> and Planning Practice Guidance provides further information on how to mitigate the adverse impacts of noise <b>and other impacts such as air and light pollution</b><sup>32</sup>.</p> <p><i>Amend footnote 32</i></p> <p><sup>32</sup> NPPG, <del><a href="https://www.gov.uk/guidance/noise-2#contents">https://www.gov.uk/guidance/noise-2#contents</a></del><b><a href="https://www.gov.uk/topic/planning-g-development/planning-officer-guidance">https://www.gov.uk/topic/planning-g-development/planning-officer-guidance</a></b></p>		Update
MSC.3.164	D12 Paragraph 3.12.4	<p>3.12.4 Noise-generating <b>cultural venues</b> such as theatres, concert halls, pubs, <b>night-clubs</b> and <del>live music</del> <b>other venues that host live or electronic</b></p>	Association of Licensed Multiple Retailers, Individuals	Clarification

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		<b>music</b> should be protected ( <u>see Policy HC5 Supporting London's culture and creative industries</u> ).		
MSC.3.165	D12 Paragraph 3.12.4A	<b>3.12.4A As well as cultural venues, the Agent of Change principle should be applied to all noise-generating uses and activities including schools, places of worship, sporting venues, offices, shops, industrial sites, waste sites, safeguarded wharves, rail and other transport infrastructure.</b>	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, Thames Water Aggregates industry, London City Airport, Port of London Authority, LB Hounslow	Clarification
MSC.3.166	D12 Paragraph 3.12.5	3.12.5 Housing and <b>other noise-sensitive development</b> proposed near to an existing noise-generating use should include necessary acoustic design measures <b>for example, site layout, building orientation, uses and</b>	Day Group Ltd	Clarification



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		<b>materials</b> . This will ensure new development has effective <del>sound insulation</del> <b>measures in place</b> to mitigate and minimise potential noise impacts or neighbour amenity issues.		
MSC.3.167	D12 Paragraph 3.12.5A	<b>3.12.5A On-going and longer-term management of mitigation measures should be considered, for example through a noise servicing management plan. Policy T7 Freight and servicing provides guidance on managing the impacts of freight, servicing and deliveries.</b>	Freight and Transport Association, UK Warehousing Association, London Industrial and Logistics Sounding Board, London Riverside BID Theatres Trust, LB Islington	Clarification and Consistency with T7
MSC.3.168	D12 Paragraph 3.12.6A	<b>3.12.6A The Agent of Change principle predominantly considers the impacts of noise-generating uses and activities but other nuisances should be considered under this policy. Other nuisances include dust, odour, light</b>	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment	Clarification and consistency with rest of the Plan

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		<b>and vibrations should also be considered (see Policy SI1 Improving air quality and T7 Freight and servicing). This is particularly important for development proposed for co-location with industrial uses and the intensification of industrial estates (see Policy E7 Intensification, co-location and substitution, part E (4)). When considering co-location and intensification of industrial areas, boroughs should ensure that existing businesses and uses do not have unreasonable restrictions placed on them because of the new development.</b>	Agency, Thames Water Aggregates industry, London City Airport, Port of London Authority, LB Hounslow	
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MSC.3.169	D12 paragraph 3.12.7	<p>3.12.7 <b>Noise and other impact assessments</b> accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the <b>noise particular</b> characteristics of existing uses can be properly captured and assessed. For example, <del>cultural venues</del> <b>some businesses and activities</b> can have peaks of noise at different times of the day and night and on different days of the week, and boroughs should require a noise impact assessment to take this into consideration. Boroughs should pay close attention to the assumptions made and methods used in <del>noise</del> impact assessments to ensure a full and accurate assessment.</p>	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, Thames Water Aggregates industry, London City Airport, Port of London Authority, LB Hounslow	Clarification
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MSC.3.170	D12 paragraph 3.12.8	3.12.8 Reference should be made to Policy D13 Noise which considers the impacts of noise-generating activities on a wider scale <b>and Policy S11 Improving air quality which considers the impacts of existing air pollution. Further guidance</b> on managing and mitigating noise in <del>mixed-use</del> development <b>and town-centre development</b> is also provided in the Mayor's London Environment Strategy.	Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency	Clarification and consistency within the Plan
MSC.3.171	D13 A 2	A ..... and other non-aviation development proposals should manage noise by:  2) reflecting the Agent of Change principle <b>as set out in Policy D12.</b> <del>to ensure measures do not add unduly to the</del>		Clarification

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		<del>costs and administrative burdens on existing noise-generating uses</del>		
MSC.3.172	D13 A 3	A .....and other non-aviation development proposals should manage noise by:  3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on <b>existing noise generating uses development</b>	Port of London Authority	Clarification
MSC.3.173	D13 A 5	A ..... and other non-aviation development proposals should manage noise by:  5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and	Day Group Ltd	Clarification

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		some types of industrial uses) through the use of distance, screening, <del>of internal</del> layout, <b>orientation, uses or materials</b> – in preference to sole reliance on sound insulation.		
MSC.3.174	D13 Paragraph 3.13.1	3.13.1 .....Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, for example in relation to internationally important nature conservation sites which contain noise-sensitive species. <b>Boroughs, developers, businesses and other stakeholders should work collaboratively to identify the existing noise climate and other noise issues to ensure effective management and mitigation measures are achieved in new development proposals</b>	Port of London Authority	Clarification

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MSC.3.175	D13 Paragraph 3.13.2	3.13.2.....Through the application of this principle existing land uses should not be unduly <del>impacted</del> <b>affected</b> by the introduction of new noise-sensitive uses. <b>For noise-generating uses regard should be had to not prejudicing their potential for intensification or expansion.</b>	Port of London Authority	Clarification
MSC.3.176	D13 Paragraph 3.13.3	3.13.3 The management of noise also includes promoting <b>good acoustic design of the inside of buildings.</b> Section 5 of BS 8223:2014 provides guidance on how best to achieve this. <b>The Institute of Acoustics has produced advice Pro:PG Planning and Noise (May 2017) that may assist with the implementation of residential developments. BS4214 provides guidance on monitoring noise issues in mixed residential/industrial areas.</b>	Hoare Lea LLP Chartered Institute of Building Services Engineers	Clarification

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Chapter 4 Housing				
MSC.4.1	H1 B 2 a	<p>B To ensure that ten-year housing targets are achieved:</p> <p>2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <p>a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a <b>Tube</b> station<sup>34A</sup>, <del>rail station</del> or town centre boundary<sup>35</sup></p> <p><sup>34A</sup> <b>Tube, rail, DLR and tram stations</b></p> <p><sup>35</sup> District, major, metropolitan and international town centres – <b>for the purposes of Policy H1B2a, the 800m distance is measured from the edge of the town centre boundary</b></p>	London Boroughs, Developers	Clarification
MSC.4.2	H1 B 2 b	<p>B To ensure that ten-year housing targets are achieved:</p>	Tesco	Clarification

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		<p>2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <p>b) mixed-use redevelopment of car parks and low-density retail parks <b>and supermarkets</b></p>		
MSC.4.3	H1 B 2 e	<p>B To ensure that ten-year housing targets are achieved:</p> <p>2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <p>e) small housing sites (see <u>Policy H2 Small sites <b>and small housing developments</b></u>)</p>		Consistency
MSC.4.4	H1 B 2 f	<p>B To ensure that ten-year housing targets are achieved:</p>		Consistency

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		<p>2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <p>f) industrial sites that have been identified through the processes set out in <u>Policy E4 Land for industry, logistics and services to support London's economic function</u>, <u>Policy E5 Strategic Industrial Locations (SIL)</u>, <u>Policy E6 Locally Significant Industrial Sites</u> and <u>Policy E7 <b>Industrial</b> intensification, co-location and substitution.</u> <del><u>of land for industry, logistics and services to support London's economic function</u></del></p>		
MSC.4.5	H1 Paragraph 4.1.8	4.1.8...Boroughs <del>are encouraged to</del> <b>should</b> identify as many sites, including small sites, as possible via their Development Plan documents <del>and brownfield registers.</del>	House Builders Federation	Factual update

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MSC.4.6	H1 Paragraph 4.1.8	4.1.8...This is because, in contrast with recent annual trends on small sites, the figures in Table 4.2 are considered to better reflect the step change that can be expected in housing delivery through the presumption in favour of small housing developments ( <u>Policy H2 Small sites <b>and small housing developments</b></u> ) and the package of measures outlined in the London Housing Strategy.		Consistency
MSC.4.7	H1 Paragraph 4.1.8A	<b>4.1.8A If a target is needed beyond the 10 year period (2019/20 to 2028/29) boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041), in consultation with the GLA and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements and roll forward the housing capacity assumptions applied in the London Plan for small sites.</b>	Authorities outside London, House Builders Federation, Developers	Clarification

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MSC.4.8	H2	<b>Policy H2 Small sites and small housing developments</b>		Clarification
MSC.4.9	H2 A	A Small sites ( <b>below 0.25 hectares in size</b> ) should play a much greater role in housing delivery <b>to achieve the ten-year housing targets set out in <u>Policy H1 Increasing housing supply</u></b> , and <del>B</del> Boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making in order to:	Developers	Clarification
MSC.4.10	H2 A 5	<b>5) achieve the targets for small sites set out in Table 4.2.</b>		Clarification
MSC.4.11	H2 B 2 a	B Boroughs should: 2) prepare area-wide design codes for small housing developments between 1 to 25 homes to: <del>a) promote good design and to</del> proactively encourage increased housing provision, <b>good design</b> and higher residential densities	London Boroughs	Clarification
MSC.4.12	H2 B 2 b	B Boroughs should:	London Boroughs	Clarification

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		<p>2) prepare area-wide design codes for small housing developments between 1 to 25 homes to:</p> <p><b>b) cover the spatial locations set out in part D2 (excluding the exempted areas listed in part F)</b></p>		
MSC.4.13	H2 B 2 c	<p>B Boroughs should....</p> <p>2) prepare area-wide design codes for small housing developments between 1 to 25 homes to:</p> <p><del>c) on small housing developments. Design codes should</del> provide clear guidelines and parameters for <b>the range of small-scale</b> housing developments <b>listed in part D2, as a minimum, to provide certainty</b> and show how additional housing provision can be accommodated in different locations, drawing on the principles set out in this policy and Supplementary Planning Guidance provided by the GLA.</p>	London Boroughs	Clarification
MSC.4.14	H2 C	C Boroughs should increase planning certainty on small sites by:	London Boroughs	Clarification

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		1) identifying and allocating appropriate small sites for residential development 2) listing these sites on their brownfield registers 3) granting permission in principle on specific sites or preparing local development orders. <i>Add sub-heading</i> <b>The presumption in favour of small housing developments between 1 and 25 homes</b>		
MSC.4.15	H2 D 1	D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes: 1) infill development on vacant or underused <b>brownfield</b> sites	London Boroughs, Developers	Clarification
MSC.4.16	H2 D 2	D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development	London Boroughs, Developers	Readability and clarification

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		<p>which provide between one and 25 homes:</p> <p>2) proposals to increase the density of existing residential <del>houses</del> <b>usesmes</b> within PTALs 3-6 or within 800m of a <del>Tube</del> station<sup>37A</sup>, <del>rail station</del> or town centre boundary<sup>37B</sup> through:</p> <p>a) residential conversions <b>(subdivision of houses into flats)</b></p> <p>b) residential extensions <b>(upward, rear and side)</b></p> <p>c) the demolition and/or redevelopment of existing <del>buildings houses and/or</del> <b>ancillary buildings</b></p> <p>d) infill development within the curtilage of a house<sup>37C</sup></p> <p><b><sup>37A</sup> Tube, rail, DLR or tram station</b></p> <p><b><sup>37B</sup> District, major, metropolitan and international town centres – for the purposes of Policy H2D2, the 800m distance is measured from the edge of the town centre boundary</b></p> <p><b><sup>37C</sup> Subject to the total area of ground covered by buildings within the curtilage of the dwelling house not exceeding 50% of the total area of</b></p>		
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		<b>the curtilage (excluding the ground area of the original dwelling house), to be consistent with the Government's permitted development rights for a household set out in Part 1 of Schedule 2 of Town and Country Planning (General Permitted Development) (England) Order 2015).</b>		
MSC.4.17	H2 D 3	D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:  3) the redevelopment or upward extension of flats, <del>and</del> non-residential buildings <b>and residential garages</b> to provide additional housing.	London Boroughs, Developers	Clarification
MSC.4.18	H2 E	E For the purposes of part D, the presumption in favour of small housing developments means approving small housing developments <del>which are in accordance with a design code developed in accordance with part B.</del> <b>Where there is no such design code, the presumption means approving small</b>	London Boroughs, Historic England, MHCLG, Community Groups, Individuals	Clarification

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		<p><del>housing development</del> unless it can be demonstrated that the development would give rise to an unacceptable level of harm <del>to residential privacy, designated heritage assets, biodiversity or a safeguarded land use</del> that outweighs the benefits of additional housing provision; <b>or where development does not comply with a design code prepared in accordance with part B.</b></p>		
MSC.4.19	H2 F	<p>F The presumption in favour of small housing developments should not be applied to:</p> <ol style="list-style-type: none"> <li>1) <del>statutory listed buildings</del> <b>designated heritage assets and their settings<sup>37D</sup> (however, a presumption in favour of residential conversions should be applied in conservation areas)</b></li> <li>2) developments providing more than 25 homes</li> <li>3) proposals that do not provide net additional housing</li> </ol>	London Boroughs, Historic England, MHCLG, Community Groups, Individuals	Factual update Clarification

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		<p>4) sites of more than 0.25 hectares in size</p> <p>5) non-self-contained housing schemes (i.e. that are not in Class C3 residential use)</p> <p>6) <del>mixed-use proposals within sites that</del> <b>contribute to the strategic functions of</b> the Central Activities Zone (CAZ)</p> <p>7) <del>estate regeneration schemes.</del> <b>designated industrial or employment sites</b></p> <p>8) <b>change of use of non-residential buildings to residential use<sup>37E</sup></b></p> <p>9) <b>designated Green Belt, MOL, Sites of Importance for Nature Conservation (SINCs)<sup>37F</sup> and other protected public open spaces</b></p> <p>10) <b>buildings that would be more than 30 metres high (following their redevelopment or extension)</b></p> <p>11) <b>development that involves the alteration or replacement of existing homes on social housing estates.</b></p>		
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		<p><sup>37D</sup> <b>See glossary for definitions of ‘designated heritage assets’ and ‘setting of heritage assets’</b></p> <p><sup>37E</sup> <b>See paragraph 4.2.3A</b></p> <p><sup>37F</sup> <b>See definition in paragraph 8.6.1</b></p>		
MSC.4.20	H2 G	<p><b>G Homes located on the ground floor on minor developments should meet the requirements of Policy D5 Accessible Housing; New build homes on sites capable of accommodating ten units or fewer which are on the ground floor should meet M4(2) standard for ‘accessible and adaptable dwellings’ and provide step-free access. New build homes on these sized sites homes</b> that are not on the ground floor <b>on minor developments</b> do not need to meet M4(2) standards and can comply with the M4(1) standard, which does not require step-free access.</p>	London Boroughs	Clarification
MSC.4.21	H2 H	<p><b>H <u>Policy H6 Threshold approach to applications</u> must be applied to small sites which are major developments</b></p>	London Boroughs, Community Groups, Individuals	Clarification

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		<p><b>and trigger affordable housing requirements.</b> Boroughs wishing to apply affordable housing requirements to <b>minor developments</b> <del>sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm</del> should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions <b>and- Boroughs</b> are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development <b>in these instances.</b></p>		
MSC.4.22	H2 I	<p><b>HA</b> <b>To benefit from the presumption, small housing developments must:</b></p> <p><b>a) meet the minimum standards for private internal space and private outside space set out in <u>Policy D4 Housing quality and standards</u></b></p> <p><b>b) meet minimum cycle parking standards</b></p>	London Boroughs, Community Groups, Individuals	Clarification

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		<p><b>c) not exceed maximum residential parking standards</b></p> <p><b>d) accord with Agent of Change principles and <u>Policy HC7 Protecting public houses</u></b></p> <p><b>e) where they are classified as major developments, meet the Air Quality Neutral benchmark<sup>37G</sup> for building emissions, by using ultra-low NOx boilers or other less polluting technologies<sup>37H</sup>.</b></p> <p><sup>37G</sup> <b>Air Quality Neutral benchmarks are set out in <u>Policy SI1 Improving air quality</u> and accompanying GLA guidance</b></p> <p><sup>37H</sup> <b>Less polluting technologies could include heat pumps, connection to an existing district heating scheme, fuel cells or renewables.</b></p>		
MSC.4.23	H2 J	<b>HB To benefit from the presumption in Part E, minor developments should achieve no net loss of overall green cover and major developments should</b>	London Boroughs, Community Groups, Individuals	Clarification

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		<b>contribute to urban greening in line with <u>Policy G5 Urban greening</u> and the Urban Greening Factor.</b>		
MSC.4.24	H2 K	<b>HC Small housing developments that demonstrably fail to optimise potential housing delivery on a site, or prejudice the more comprehensive development of a site allocation, should not benefit from the presumption in favour of development, unless there is a clear justification. Small developments should be designed to facilitate adjacent sites to come forward in the future.</b>	London Boroughs	Clarification
MSC.4.25	H2 4.2.1	4.2.1 For London to meet its housing needs, <del>small housing developments</del> <b>small sites below 0.25 hectares in size</b> <del>of between one and 25 homes</del> must make a substantially greater contribution to new supply across the city...	London Boroughs, Developers	Clarification
MSC.4.26	H2	4.2.3 <b>The one to 25-unit threshold</b> <del>set out in Policy H2 Small sites</del> which triggers		Clarification

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	4.2.3 Footnote 39 & 40	<p>the application of <del>this policy the</del> <b>presumption in favour of small housing development</b> is considered to be representative of small housing developments across London and for this reason differs from that used in Planning Practice Guidance<sup>39</sup> and the definition of 'major development' in planning legislation<sup>40</sup>.</p> <p><i>Amend footnote 39 as follows:</i> DCLG, Planning Practice Guidance, Planning obligations, Paragraph: 031 Reference ID: 23b-031-20161116; <a href="https://www.gov.uk/guidance/planning-obligations">https://www.gov.uk/guidance/planning-obligations</a></p> <p><i>Amend footnote 40 as follows:</i> The Town and Country Planning (Development Management Procedure) (England) Order 2010, Article 2 <a href="http://www.legislation.gov.uk/uksi/2010/2184/pdfs/uksi_20102184_en.pdf">http://www.legislation.gov.uk/uksi/2010/2184/pdfs/uksi_20102184_en.pdf</a></p>		
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MSC.4.27	H2 4.2.3A	<b>4.2.3A The presumption in favour of small housing developments does not apply to change of use of non-residential floor space to residential use (where this does not involve redevelopment); however, it does apply to the redevelopment of non-residential buildings, subject to relevant exemptions listed in Policy H2F. This distinction aims to incentivise the most optimal form of potential development.</b>	London Boroughs, Developers	Clarification
MSC.4.28	H2 4.2.3B	<b>4.2.3B When assessing the benefits of additional housing provision (Policy H2E), boroughs should recognise that schemes which provide relatively low numbers of new homes play an important cumulative role in helping to meet housing supply targets alongside larger developments, subject to the scheme in question making the most efficient use of land.</b>		Clarification

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MSC.4.29	H2 4.2.4	4.2.4 The <b>small sites targets</b> in Table 4.2 are informed by the 2017 London SHLAA and show the potential capacity for additional housing on sites of less than 0.25 hectares in size, <b>a category that is likely to include the vast majority of one to 25-unit developments. Hence, the small sites targets include housing capacity from small sites below this size threshold which deliver more than 25 homes.</b> The targets...		Clarification
MSC.4.30	H2 4.2.5	4.2.5 <b>Incremental intensification</b> of existing residential areas within PTALs 3-6 <del>or and</del> within 800m of a <del>Tube</del> station <sup>40A</sup> , <del>rail station</del> or town centre boundary <sup>40B</sup> is expected to play an important role in meeting the housing targets for small sites, particularly in outer London. This can take a number of forms including new build, infill development, conversions, demolition and redevelopment or extension of existing buildings, where this results in	Historic England	Factual update to exempt designated heritage assets.

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		<p>net additional housing provision, <b>subject to the location of heritage assets and their settings. Outside the exempted</b> <del>Within these</del> areas <b>(Policy H2F)</b>, there is a need for the character of some neighbourhoods to evolve to accommodate additional housing. Therefore, <b>in these locations</b> the emphasis of decision-making should change from preserving what is there at the moment towards encouraging and facilitating the delivery of well-designed additional housing to meet London's needs.</p> <p><sup>40A</sup> <b>Tube, rail, DLR or tram station</b></p> <p><sup>40B</sup> <b>District, major, metropolitan and international town centres</b></p>		
MSC.4.31	H2 4.2.6	4.2.6 The Mayor will set out <b>design principles</b> for small housing developments across London as part of his review of GLA design guidance, which boroughs should draw on and supplement when preparing design codes. Design codes can be combined		Clarification

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		with local development orders, where appropriate. <b>As a key purpose of design codes is to provide clarity and certainty for potential applicants, boroughs should support design proposals which accord with any published design code.</b>		
MSC.4.32	H2 4.2.7	4.2.7 <b>Boroughs are encouraged to explore opportunities for small housing developments in conservation areas where these will complement and enhance the area. As not all elements of a conservation area will necessarily contribute to its significance there is the potential for well-designed new housing to make a positive contribution to the special character of conservation areas. This also applies to small sites in the setting of other heritage assets such as listed buildings. Special attention will be required within conservation areas to ensure that increased housing provision is accommodated in a way that</b>	Historic England	Clarification

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		<del>also complements and enhances an area, taking into account conservation area character appraisals and management plans.</del>		
MSC.4.33	H2 4.2.7A	<b>4.2.7A Specialist housing for older people that is in Class C3 use can benefit from the presumption in favour of small sites, where the requirements of Policies H2D to H2K are met.</b>	Specialist housing providers	Clarification
MSC.4.34	H2 4.2.8	4.2.8 ... Environmental and architectural innovation should be supported and schemes should achieve <b>good design</b> and ensure that existing and proposed homes benefit from satisfactory levels of daylight and sunlight. <del>All homes must meet the housing standards in <u>Policy D4 Housing quality and standards</u>, including the provision of private open space.</del>	London Boroughs, Community Groups, Individuals.	Readability
MSC.4.35	H2 4.2.8A	<b>4.2.8A In view of the objectives of this policy, boroughs should promote well-designed small housing developments which respond</b>	London Boroughs, Developers	Clarification

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		<b>positively to local character and the opportunity to accommodate additional housing on a particular site and should not refuse applications because of a conflict with local policies where these policies are inconsistent with Policy H2 and pre-date the publication of the London Plan.</b>		
MSC.4.36	H2 4.2.8B	<b>4.2.8B Where existing houses are redeveloped or subdivided, boroughs may require the provision of family sized units (3 bed + units) providing sufficient design flexibility is provided to allow the existing footprint of a house to be enlarged in order to meet this requirement.</b>	London Boroughs	Clarification
MSC.4.37	H2 4.2.9	4.2.9 <b>Impacts on</b> <del>Loss of</del> existing biodiversity or <b>green space</b> , as a result of small housing developments, should be <b>minimised and</b> mitigated through measures such as <b>returning hard standing to green space</b> , the installation of green roofs, <b>green walls,</b>	London Boroughs	Clarification

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		<p>the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. <b>The principle of no net loss can be met through off-site provision where site constraints mean that it cannot be achieved on site. Any off-site provision must be secured robustly, for example through a cash in lieu payment to the borough to contribute towards localised urban greening projects which provide net additional green cover.</b> Rainwater attenuation features should be incorporated to achieve greenfield run off rates <b>where possible.</b></p>		
MSC.4.38	H2 Figure 4.3	<p><b>Figure 4.3 - Proximity to town centres and stations</b></p> <p><i>Amend title of key:</i> Proximity to town centres <b>and stations</b></p> <p><b>Amend key:</b></p>	London Boroughs, Developers	Clarification

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		800m distance to a London Underground Station <b>or Rail Station</b>		
MSC.4.39	H2 4.2.13	4.2.13 For practical reasons associated with on-site provision of a small number of affordable units (such as management), contributions on <b>minor developments sites delivering ten or fewer units</b> should be asked for as a <b>cash in lieu contribution</b> . Boroughs should have an identified programme through which additional affordable homes will be delivered. Flexibility should be allowed in the timing of payments in recognition of the distinct economics of small and medium-sized housebuilders and to reduce their up-front costs. <b>Further guidance on the potential application of the threshold approach (Policy H6) for small sites of 25 units and fewer is provided in <u>Policy H6 Threshold approach to applications</u>.</b>		Clarification
MSC.4.40	H3 A	A The ten-year housing targets set out in Table 4.1 should be monitored in net terms taking into account homes lost	LB Camden, Community Groups,	Clarification



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		through demolition, <b>amalgamations</b> <sup>41A</sup> or change of use <sup>41B</sup> . <sup>41A</sup> <b>Amalgamating flats into larger homes</b> <sup>41B</sup> <b>For example, a scheme involving 25 gross new homes and the loss of 10 existing homes would contribute 15 net additional homes towards meeting housing targets</b>	Association of Consultancy & Engineering	
MSC.4.41	H3 BA	<b>BA The small sites targets are a component of, and not additional to, the overall housing targets. The relative contribution from large and small sites may fluctuate across the target period, providing the overall 10 year targets are met in a way that is consistent with the policies in the Plan.</b>	London Boroughs	Clarification
MSC.4.42	H3 C	C Net non-self-contained accommodation for students and shared living schemes should count towards meeting housing targets on the basis of a 3:1 ratio, with three bedrooms/ <b>units</b> being counted as a single home.		Consistency within the Plan

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MSC.4.43	H3 Paragraph 4.3.3A	<p><b>4.3.3A</b> The approach to monitoring net housing provision from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply will free up<sup>42</sup>.</p> <p><b>The rationale for this approach is explained in more detail in paragraphs 7.19 to 7.29 of the 2017 SHLAA report.</b></p> <p><del><sup>42</sup> For more detail on this see the 2017 SHLAA report.</del></p>	London Boroughs, Developers	Clarification
MSC.4.44	H4	<b>Policy H4 Meanwhile use as housing</b>	Natural England, Federation of Small Businesses, LB Bexley, RB Greenwich, LB Southwark, LB Merton, The British Library, London NHS Clinical Commissioning Group, London Waste and Recycling Board	Clarification

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MSC.4.45	H4 4.4.1	4.4.1 ...Opportunities for the meanwhile use of land for housing on large-scale phased developments should be identified during the planning process. <b>The meanwhile use of a site for housing does not change the established land use of the site, and this should be made clear in the temporary planning permission.</b>	Westminster City Council	Clarification
MSC.4.46	H4 4.4.1	4.4.1 ... <b>However, meanwhile housing should count towards meeting a borough's housing target.</b>	LB Bromley and LB Sutton	Clarification
MSC.4.47	H4 4.4.1A	<b>4.4.1A</b> The meanwhile use of a site must not result in an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.		Readability

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MSC.4.48	H4 Paragraph 4.4.3	4.4.3 The <b>time period</b> for meanwhile uses will vary <b>and temporary permission may be renewed</b> with <b>consideration for</b> site circumstances. Boroughs should consider starting the time period for the meanwhile use from the date of occupation rather than the date of planning permission, in order to support the viability and delivery of meanwhile housing developments.	London Councils	Clarification
MSC.4.49	H5 A	A The strategic target is for 50 per cent of all new homes delivered across London to be <b>genuinely</b> affordable. Specific measures to achieve this aim include:		Consistency within the Plan
MSC.4.50	H5 A 1	A ... Specific measures to achieve this aim include: 1) requiring <del>residential and mixed-use developments</del> <b>major developments which trigger affordable housing requirements<sup>42A</sup></b> to provide affordable housing through the threshold approach ( <u>Policy H6 Threshold approach to applications</u> )	Developers	Clarification

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		<b><sup>41C</sup> All major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with <u>Policy H2 Small sites and small housing developments</u></b>		
MSC.4.51	H5 A 3	A ... Specific measures to achieve this aim include: 3) <b>all</b> affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their <del>portfolio</del> <b>development programme, and 60 per cent in the case of strategic partners<sup>42B</sup></b> <b><sup>41D</sup> Strategic partners are affordable housing providers who commit to deliver ambitious development programmes through a flexible partnership with the Mayor. Each partnership involves at least 1,000 new housing starts, with at least 60 per cent of them genuinely affordable.</b>		Clarification
MSC.4.52	H5 A 4	A ... Specific measures to achieve this aim include:	London Boroughs, Just Space, Elephant	Clarification

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		<p>4) public sector land<sup>42C</sup> delivering at least 50 per cent affordable housing <b>on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio</b> <del>across its portfolio</del></p> <p><sup>41E</sup> <b>Separate affordable housing requirements apply to estate regeneration schemes on public sector land, which are set out in <u>Policy H10 Redevelopment of existing housing and estate regeneration</u>.</b></p>	Amenity Network, 35% Campaign, Individuals	
MSC.4.53	H5 A 5	<del>5) strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio</del>		Readability
MSC.4.54	H5 A 5A	<p>A ... Specific measures to achieve this aim include:</p> <p><b>5A) industrial land appropriate for residential uses in accordance with <u>Policy E7 Industrial intensification, co-location and substitution</u>, delivering at least 50 per cent affordable housing where the scheme</b></p>		Consistency within the Plan

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		<b>would result in a net loss of industrial capacity.</b>		
MSC.4.55	H5 B	B Affordable housing should be provided on site <del>in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners.</del> Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.		Readability
MSC.4.56	H5 4.5.1	4.5.1 Delivering more <b>genuinely affordable housing</b> <sup>43</sup> is a key strategic issue for London...  <sup>43</sup> <del>The Glossary provides the definition of affordable housing, this is consistent with the 2012 NPPF definition of affordable housing</del> <b>The NPPF defines affordable housing for planning purposes.</b> Within this broad definition, sections 4.7.3 - 4.7.69 of this Plan set out the Mayor's preferred <b>affordable housing</b> tenures <b>and other genuinely affordable housing products.</b>		Clarification

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MSC.4.57	H5 4.5.2A	<b>4.5.2A</b> Schemes that do not meet this threshold, or require public subsidy to do so, will be required to submit detailed viability information which will be scrutinised and treated transparently.		Readability
MSC.4.58	H5 4.5.4A	<b>4.5.4A The Mayor expects all affordable housing providers to deliver as much affordable housing as possible. Affordable housing providers with agreements with the Mayor should deliver at least 50 per cent affordable housing across their development programme, and in the case of strategic partners, 60 per cent. Affordable housing commitments by these providers are not planning requirements that can be applied to individual sites as the commitments are only achievable if the affordable housing providers have the flexibility to use their resources strategically to maximise affordable housing provision across London.</b>		Clarification



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MSC.4.59	H5 4.5.4B	<b>4.5.4B Public sector land represents an opportunity to deliver homes that can meet the needs of London's essential workers who maintain the function and resilience of the city. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site. Public sector landowners with an agreement with the Mayor may provide 50 per cent affordable housing across a portfolio of sites provided at least 35 per cent affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35 percent.</b>		Clarification
MSC.4.60	H5 4.5.4C	<b>4.5.4C Most industrial land fulfils a vital role in supporting London's economy. However, it is occasionally deemed appropriate for residential uses. In these circumstances, there is potential for a significant difference in value between the two uses. The</b>		Clarification

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		<b>Mayor expects that residential proposals in industrial land should deliver at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.</b>		
MSC.4.61	H5 4.5.5	4.5.5 Affordable housing should be delivered on site to help deliver mixed and inclusive communities <b>providing choice to a range of Londoners...</b>		Clarification
MSC.4.62	H5 4.5.6 Footnote 45	<sup>45</sup> For exceptions see <del>part F of</del> <u>Policy H2 Small sites and small housing developments</u> and Policy H18 Large-scale purpose-built shared living.		Consistency
MSC.4.63	H5 4.5.8 Footnote 46	<i>Amend footnote 46 as follows:</i> Community Infrastructure Levy Regulations 2010 (SI 2010 No 948), Regulation 122(2). Crown Copyright, 2010: <a href="http://www.legislation.gov.uk/uksi/2010/948/pdfs/uksi_20100948_en.pdf">http://www.legislation.gov.uk/uksi/2010/948/pdfs/uksi_20100948_en.pdf</a>		Factual update
MSC.4.64	H6 A	A The threshold approach applies to <b>major</b> development proposals <del>which are capable of delivering more than ten units</del>		Clarification

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		<del>or which have a combined floor space greater than 1,000 sqm</del> <b>which trigger affordable housing requirements</b> (see paragraph <del>4.6.14 for exclusions to the threshold approach and</del> 4.6.15 for scheme types with bespoke approaches).		
MSC.4.65		B The threshold level of affordable housing on gross residential development is initially set at: 1) a minimum of 35 per cent; <b>or</b>		
MSC.4.66	H6 B	B The threshold level of affordable housing <b>on gross residential development</b> is initially set at:	London Boroughs, Developers	Clarification
MSC.4.67	H6 B 2	2) 50 per cent for public sector land <b>where there is no portfolio agreement with the Mayor; or</b>	Public sector landowners, London Boroughs	Clarification
MSC.4.68	H6 B 3	3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and <del>other industrial sites</del> <b>Non-Designated Industrial Sites</b> <del>deemed appropriate to release</del> <b>appropriate</b> for	London Boroughs, Developers	Clarification

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		<del>other residential</del> uses ( <u>see in accordance with Policy E7 Industrial intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</u> ), <b>where the scheme would result in a net loss of industrial capacity.</b>		
MSC.4.69	H6 B	B ... <del>The 35 per cent threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance.</del>		Readability
MSC.4.70	H6 C 1	C To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria: 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy. <b>Where agreed by the borough, small housing developments<sup>46A</sup> may follow the Fast Track Route where they meet the relevant threshold level off-site or as an in lieu payment<sup>46B</sup></b>	Developers, London Boroughs	Clarification

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		<p><b><sup>46A</sup> Small housing developments are defined in <u>Policy H2 Small sites</u> as schemes providing up to 25 homes</b></p> <p><b><sup>46B</sup> Small housing development affordable housing requirements provided off-site or as an in-lieu contribution should follow the approach set out in paragraphs 4.5.7 to 4.5.9</b></p>		
MSC.4.71	H6 C 2	<p>C To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria: ...</p> <p>2) be consistent with the relevant tenure split (see Policy H7 Affordable housing tenure). <b>Small housing developments may follow the Fast Track Route where the tenure split is to the satisfaction of the borough.</b></p>	Developers, London Boroughs	Clarification
MSC.4.72	H6 C 4	<p>C To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria: ...</p> <p>4) demonstrate that they have taken account of the strategic 50 per cent target in <u>Policy H5 Delivering affordable</u></p>		Clarification

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		<u>housing</u> and have sought grant <b>where required</b> to increase the level of affordable housing <del>beyond 35 per cent.</del>		
MSC.4.73	H6 CA	<b>CA Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant.</b>	Pocket Living	Clarification
MSC.4.74	H6 G	G For schemes that were approved under the Fast Track Route <b>and schemes determined before the threshold approach that would have qualified for the Fast Track Route</b> , any subsequent applications to vary the consent will not be required to submit viability information, providing the resultant development continues to meet the relevant threshold and the criteria in part C	Developers, London Boroughs	Clarification
MSC.4.75	H6 H	H For schemes where the original permission did not meet the threshold or required tenure split, <b>including schemes determined before the</b>	Developers, London Boroughs	Clarification

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		<b>threshold approach that would not have qualified for the Fast Track Route</b> , viability information will be required where an application is submitted to vary the consent and <b>the borough or the Mayor where relevant consider</b> this would <b>materially</b> alter the economic circumstances of the scheme. Such cases will be assessed under the Viability Tested Route.		
MSC.4.76	H6 4.6.3	4.6.3 The percentage of affordable housing on a scheme should be measured in <b>habitable rooms</b> <sup>46C</sup> . If this is not the case, it may be more appropriate to measure the provision of affordable housing using <b>habitable floorspace</b> <sup>46D</sup> .  <sup>46C</sup> <b>Habitable room is defined in the Glossary</b> <sup>46D</sup> <b>Habitable floorspace is defined in the Glossary</b>	London Boroughs	Clarification
MSC.4.77	H6 4.6.4	4.6.4 The 35 per cent threshold level will be <b>monitored and</b> reviewed in 2021 to		Clarification

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		determine whether this threshold should be increased.		
MSC.4.78	H6 4.6.5A	<b>4.6.5A</b> Public sector land also represents...		Readability
MSC.4.79	H6 4.6.6	4.6.6 Given the difference in values between industrial and residential development, <del>where all residential development proposals that would result in a net loss of industrial capacity on</del> Strategic Industrial Locations, Locally Significant Industrial Sites or <del>other industrial sites are</del> <b>Non-Designated Industrial Sites</b> <del>deemed acceptable for release (see <u>Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</u>), they</del> are expected to <del>deliver a higher level of</del> <b>provide at least 50 per cent</b> affordable housing. If this is not possible, detailed viability evidence will be needed to justify a lower level of affordable housing. <del>Therefore, to follow</del>	London Boroughs, Developers	Clarification



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		<del>the Fast Track Route industrial sites will need to meet the 50 per cent threshold.</del>		
MSC.4.80	H6 4.6.8B	<b>4.6.8A In some circumstances it may be impractical or otherwise unsuitable to provide on-site affordable housing with the relevant tenure split on small housing developments (see <u>Policy H2 Small sites</u> and small housing developments). Affordable housing providers may not be willing or able to absorb a small number of affordable homes into their portfolio where servicing and management costs would exceed plausible income from service charges. Servicing and management costs may be reduced where affordable homes are provided in a single affordable tenure.</b>	London Boroughs, Developers	Clarification
MSC.4.81	H6 4.6.8C	<b>4.6.8B Boroughs may therefore permit small housing developments to access the Fast Track Route where on-site affordable housing is provided in a single affordable housing tenure to the satisfaction of the borough.</b>	London Boroughs, Developers	Clarification

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		<b>Where there is no demand from affordable housing providers for a small number of affordable homes, either where provided as mix of affordable tenures or in a single affordable housing tenure, boroughs may permit small housing developments to access the Fast Track Route where the relevant threshold is met off-site or as an in-lieu payment. Boroughs are encouraged to set out their approach to affordable housing requirements on small housing developments.</b>		
MSC.4.82	H6 4.6.8D	4.6.8D To incentivise schemes <del>that are largely or entirely</del> <b>with a high proportion of genuinely</b> affordable housing, schemes that propose 75 per cent or more <b>genuinely</b> affordable housing, <del>consistent with the glossary definition of affordable housing,</del> may be considered under the Fast Track Route whatever the affordable housing tenure mix <del>as long as the tenure and type of</del>	Pocket Living	Clarification

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		<del>home are, where</del> supported by the borough and, where relevant, the Mayor; <del>as being genuinely affordable</del> . This should be determined on a case-by-case basis having regard to the housing need met by the scheme and the level of public subsidy involved.		
MSC.4.83	H6 4.6.13	<del>4.6.13 In Opportunity Areas, boroughs may want to consider applying a localised affordable housing threshold for the Fast Track Route or fixed affordable housing requirements. This approach could help provide certainty to developers and land owners and help prevent land price rises based on hope value. Localised affordable housing thresholds, or fixed affordable housing requirements should increase the affordable housing provision beyond 35 per cent where possible. Boroughs may also consider a local approach in terms of tenure mix. The London Plan threshold approach will apply in Opportunity Areas where a local approach has not been progressed.</del>	London Boroughs, Developers	Clarification

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MSC.4.84	H6 4.6.14	4.6.14 Some schemes are not suitable to follow the Fast Track Route. These schemes must follow the <b>Viability Tested Route</b> . This includes: ... <ul style="list-style-type: none"> <li>applications for schemes that involve the <b>demolition of existing affordable dwellings</b> which should follow the approach set out in <u>Policy H10 Redevelopment of existing housing and estate regeneration</u></li> </ul>		Clarification
MSC.4.85	H6 4.6.15	<del>4.6.15 The approach for Build to Rent schemes, where they meet the definition, is set out <u>Policy H13 Build to Rent</u></del>		Clarification
MSC.4.86	H6 4.6.16	<b><u>4.6.16 Policy H13 Build to Rent.</u></b> <u>Policy H15 Specialist older persons housing.</u> <u>Policy H17 Purpose-built student accommodation</u> and <u>Policy H18 Large-scale purpose-built shared living</u> set out specific affordable housing approaches in those types of development.		Clarification
MSC.4.87	H7 A	A <del>The Mayor is committed to delivering genuinely affordable housing.</del> The		Readability

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		following split of affordable products should be applied to <b>residential</b> development:		
MSC.4.88	H7 A 1	A ... The following split of affordable products should be applied to residential development: 1) a minimum of 30 per cent low cost rented homes, <b>as either London Affordable Rent or Social Rent</b> , allocated according to need and for Londoners on low incomes ( <del>Social Rent/ London Affordable Rent</del> )		Clarification
MSC.4.89	H7 A 2	A ... The following split of affordable products should be applied to residential development: ... 2) a minimum of 30 per cent intermediate products which meet the definition of <b>genuinely</b> affordable housing, including London Living Rent and London Shared ownership		Clarification
MSC.4.90	H7 A 3	A ... The following split of affordable products should be applied to residential development: ...		Clarification

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		3) <b>the remaining</b> 40 per cent to be determined by the <del>relevant</del> borough as low cost rented homes or intermediate products (defined in H7A1 and H7A2) based on identified need, <del>provided they are consistent with the definition of affordable housing.</del>		
MSC.4.91	H7 A	A <del>... These minimums will be reviewed in 2021, and if necessary, updated through Supplementary Planning Guidance.</del>		Clarification
MSC.4.92	H7 B	B <del>Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability</del> <b>To follow the Fast Track Route the tenure of 35 per cent of homes must meet the requirements set out in part A. Where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in H7A1 and H7A2), and should take into account the need to maximise affordable housing</b>		Clarification

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		<b>provision, along with any preference of applicants to propose a particular tenure.</b>		
MSC.4.93	H7 4.7.1	4.7.1 <del>As Table 4.3 demonstrates, the</del> <b>The 2017</b> SHMA shows...	London Boroughs, Developers	Readability
MSC.4.94	H7 4.7.1	4.7.1 ... These <del>se</del> minimums <b>in H7A1 and H7A2</b> will be <b>monitored and</b> reviewed in 2021 and, if necessary, updated through Supplementary Planning Guidance, taking account of future affordable housing funding agreements.		Clarification
MSC.4.95	H7 4.7.2	4.7.2 There is a presumption that the <b>40 per cent to be decided by the borough</b> will focus on Social Rent <del>/</del> <b>and</b> London Affordable Rent...		Clarification
MSC.4.96	H7 Table 4.3	<i>Table 4.3 deleted from H7 and moved to H12</i>		Clarification
MSC.4.97	H7 4.7.3	<b>4.7.3 The Mayor is committed to delivering genuinely affordable housing.</b> Within the broad definition of affordable housing <sup>48</sup> ,		Clarification

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		<p>the Mayor's preferred affordable housing tenures are:</p> <ul style="list-style-type: none"> <li><b>Homes based on social rent levels, including Social Rent and London Affordable Rent</b></li> </ul>		
MSC.4.98	H7 4.7.3 Footnote 48	<del><sup>48</sup> See the Glossary for broad definition of affordable housing which is consistent with the 2012 NPPF.</del>		Clarification
MSC.4.99	H7 4.7.4	<p>4.7.4 London Affordable Rent <del>is rent and</del> <b>Social Rent homes are</b> for households on low incomes <del>with where</del> the rent levels <del>are</del> based on <del>social rent levels</del> <b>the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels for Social Rent homes use a capped formula and London Affordable Rent homes are capped at benchmark levels published by the GLA. The NPPF defines affordable rent as up to 80 per cent of market rent, however, to ensure rents in London are genuinely affordable, the Mayor expects rents charged for homes let for London</b></p>	London Boroughs, Just Space, Elephant Amenity Network, 35% Campaign, Individuals	Clarification



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		<p><del>Affordable Rent to be set at benchmarks substantially below this level, based on traditional social rents. Rents for both are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF.</del> More detail is contained within the Mayor's Homes for Londoners Affordable Homes Programme 2016-21 funding guidance. These homes will be allocated in accordance with need (based on the borough's allocations policy).</p>		
MSC.4.100	H7 4.7.7 Footnote 50	<p><b>4.7.7 Other affordable housing products</b> may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the <del>draft</del> London Housing Strategy</p> <p><i>Amend footnote 50 as follows:</i> Mayor of London, <del>September 2017</del> <b>2018</b>, London Housing Strategy, <del>draft for public consultation</del></p>		Consistency with other GLA strategies

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		<a href="https://www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf">:https://www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf</a>		
MSC.4.101	H7 4.7.11	4.7.11 To follow the Fast Track Route, the <del>threshold level of affordable housing</del> <b>tenure of 35 per cent of homes</b> must adhere to the <b>tenure split</b> set out in <u>Policy H7 Affordable housing tenure</u> . Where a scheme is delivering more than <del>the threshold 35 per cent</del> , the tenure of the additional affordable housing ( <del>above the threshold</del> ) is flexible and should <del>be agreed between the borough, Registered Provider and applicant</del> <b>take into account the need to maximise affordable housing provision along with any preference of applicants to propose a particular tenure.</b>		Consistency
MSC.4.102	H7 4.7.13	<del>4.7.13 To incentivise schemes that are largely or entirely affordable housing, schemes that propose 75 per cent or more affordable housing, consistent with the glossary definition of affordable housing, may be considered under the Fast Track Route whatever the</del>		Readability

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		<del>affordable housing tenure mix as long as the tenure and type of home are supported by the borough and, where relevant, the Mayor, as being genuinely affordable. This should be determined on a case-by-case basis having regard to the housing need met by the scheme and the level of public subsidy involved.</del>		
MSC.4.103	H9 C	C To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an applicant will be required to demonstrate that it has been vacant for a continuous period of at least five years before the application was submitted and will also be required to provide evidence that the site has been actively marketed for at least two of those five years <b>at realistic prices on realistic terms reflecting market value.</b>	Developers	Clarification
MSC.4.104	H9 C	C <b>... These requirements should not apply to heritage buildings on the At</b>	The Putney Society	Clarification

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		<b>Risk register where prolonged vacancy may damage the building.</b>		
MSC.4.105	H9 4.9.3	4.9.3 It should be noted that if an applicant is claiming that the scheme qualifies for VBC, it cannot also <b>claim the vacant buildings are 'in-use' for the purpose of calculating liability for the</b> Community Infrastructure Levy <del>relief through the vacancy test.</del>	Developers	Clarification
MSC.4.106	H10 A	A Loss of existing housing <del>is generally only acceptable where the housing is</del> <b>should be</b> replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. <del>This includes the loss</del> <b>Loss</b> of hostels, staff accommodation, and shared and supported accommodation that meet an identified housing need, <del>unless the existing floorspace is</del> <b>should be</b> satisfactorily re-provided to an equivalent or better standard.	Just Space, Elephant Amenity Network, 35% Campaign, Individuals	Readability
MSC.4.107	H10 B	B <del>Where less</del> <b>Loss</b> of existing affordable housing <del>is proposed, it</del> should not be	RPs, London Boroughs, Just Space,	Clarification

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	H10 C	<p>permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace <b>on an identical or equivalent basis<sup>50A</sup></b>, <del>and generally should produce an uplift in affordable housing provision.</del> All such schemes are required to follow the Viability Tested Route <b>and should produce an uplift in affordable housing provision where viable</b> <del>(see <u>Policy H6 Threshold approach to applications</u>).</del></p> <p><del>C For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised. All schemes should follow the Viability</del></p>	Elephant Amenity Network, 35% Campaign, Individuals	
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		<p><del>Tested Route (see <u>Policy H6 Threshold approach to applications</u>).</del></p> <p><sup>50A</sup> Affordable housing floorspace must be replaced on an identical basis where a tenant has a right to return. Where there is no right of return affordable housing must be replaced on an identical or equivalent basis. I.e. Social rented floorspace may be replaced with social rented floorspace or by general needs rented accommodation with rents at levels based on that which has been lost.</p>		
MSC.4.108	H10 4.10.2	<p>The <b>aims of an estate regeneration project</b> will typically fall into three broad categories. These are:</p> <ul style="list-style-type: none"> <li>• <del>maintaining good quality homes</del></li> <li>• <del>maintaining safe and good quality homes</del></li> <li>• <del>improving the social, economic and physical environment in which homes are located.</del></li> </ul>		Clarification

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		<ul style="list-style-type: none"> <li>• <b>delivering safe and better-quality homes for local people;</b></li> <li>• <b>increasing the overall supply of new and affordable homes; and</b></li> <li>• <b>improving the quality of the local environment through a better public realm and provision of social infrastructure (e.g. schools, parks, or community centres).</b></li> </ul>		
MSC.4.109	H10 4.10.3	4.10.3 ... This is particularly pertinent for estate regeneration, and any proposals for such schemes should take account of the requirements of the <b>Mayor's Good Practice Guide to Estate Regeneration (2018)</b> .		Clarification
MSC.4.110	H10 4.10.4	4.10.4 It is important to ensure that estate regeneration does not lead to the loss of affordable housing and that <del>it delivers</del> an <b>uplift in affordable housing is delivered</b> <del>wherever</del> possible. <b>Therefore,</b> all estate regeneration schemes <del>should</del> <b>must</b> go through the Viability Tested Route <b>to demonstrate</b>	London Boroughs, Just Space, Elephant Amenity Network, 35% Campaign, Individuals	Clarification

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		<b>they have</b> <del>and</del> maximised <b>d</b> the delivery of any additional affordable housing. For the purposes of this policy, existing affordable housing floorspace includes both occupied and vacant floorspace <b>regardless of the current condition of the stock.</b>		
MSC.4.111	H11 A	A Boroughs should promote efficient use of existing <b>housing</b> stock <del>by using all the tools available</del> to reduce the number of vacant <b>and under-occupied</b> dwellings.	Inner-London Boroughs, Just Space, Elephant Amenity Network, 35% Campaign, Individuals	Consistency with other GLA strategies
MSC.4.112	H11 B	B The Mayor will support boroughs with identified issues of <b>new</b> homes being left empty, <b>sometimes known</b> as 'buy to leave' properties, to put in place mechanisms which seek to ensure <del>stock is new homes are</del> occupied.	Developers	Clarification
MSC.4.113	H11 C	C Boroughs should take account of the impact on <del>the</del> housing stock <b>and local housing need when considering</b> <del>of</del> applications for <b>a change of use from home housing</b> to <del>be used as short stay</del>	London Boroughs	Clarification



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		holiday rentals <b>accommodation to be used</b> for more than 90 days a year.		
MSC.4.114	H11 D	<b>D Boroughs should take account of the role of houses in multiple occupation (HMOs) in meeting local and strategic housing needs. Where they are of a reasonable standard they should generally be protected.</b>	London Boroughs	Clarification
MSC.4.115	H11 4.11.1	4.11.1 ... While the numbers of <b>long-term vacant properties</b> in London has decreased significantly and is now below one per cent of the housing stock, to make best use of existing stock, where vacant properties are identified, local authorities should investigate why the units are vacant and where possible seek to bring them back into use. <b>Boroughs should levy the council tax empty homes premium to incentivise occupation of vacant properties.</b> Boroughs are encouraged to use all the tools at their disposal such as Empty Dwelling Management Orders to bring long-term vacant stock back into use as	London Boroughs,	Clarification

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		affordable housing. <b>Boroughs should also ensure a range of new homes are provided that meet the needs of those who wish to downsize, and tenants in affordable homes are supported to downsize where they wish to do so.</b>		
MSC.4.116	H11 4.11.1B	<b>4.11.1B A recent phenomenon in some parts of London has seen a proportion of new homes being purchased by investors who rely solely on capital appreciation for their returns. New homes purchased for this purpose are sometimes known as 'buy to leave'. This practice reduces the amount of new housing stock being occupied by households in need. Where the practice is widespread in a new building it can also negatively affect the provision of services to tenants.</b>	Developers, London Boroughs	Clarification
MSC.4.117	H11	4.11.2 <del>In addition, the use of dwellings as short-term holiday rentals can have a</del>	London Boroughs,	Clarification

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	4.11.2 Footnote 52A	<p><del>significant impact on the supply of homes in an area that are available for people to live in. Homes should not be</del> <b>It is unlawful for homes in Greater London to be</b> used as short-term holiday rented accommodation for a cumulative period of more than 90 days a year without seeking planning permission<sup>52A</sup>. <b>The use of dwellings as short-term holiday rentals can have a detrimental impact on neighbours' residential amenity and community cohesion in the wider area where concentrated in a particular location. The use also reduces the supply of homes available for people to live in.</b></p> <p><sup>52A</sup> <b>Pursuant to the Deregulation Act 2015 (Sections 44 and 45: Short-term use of London accommodation: relaxation of restrictions and power to relax restrictions.)</b>  <a href="http://www.legislation.gov.uk/ukpga/2015/20/pdfs/ukpga_20150020_en.pdf">http://www.legislation.gov.uk/ukpga/2015/20/pdfs/ukpga_20150020_en.pdf</a></p>	Developers	
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MSC.4.118	H11 4.11.2B	<b>4.11.2B</b> Houses in multiple occupation (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock. ...		Readability
MSC.4.119	H12 A	<b>A Schemes should generally consist of a range of unit sizes.</b> To determine the appropriate mix of unit sizes in relation to the number of bedrooms ...	MHCLG	Clarification
MSC.4.120	H12 A 1	A ... To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to: 1) the range of housing need and demand identified by the <b>2017</b> London Strategic Housing Market Assessment and, <del>where relevant, local assessments, where available, by evidence of local needs</del>		Clarification
MSC.4.121	H12 A 6	A ... To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to: 6) the nature and location of the site, with a higher proportion of one and two bed	London Boroughs, Developers	Clarification

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		units generally more appropriate in <del>more central or urban</del> locations <b>which are closer to a town centre or station or with higher public transport access and connectivity</b>		
MSC.4.122	H12 A 8	A ... To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:  8) the ability of new development to reduce pressure on conversion <del>and</del> , sub-division <b>and amalgamation</b> of existing stock	London Boroughs	Clarification
MSC.4.123	H12 A 10	A ... To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:  <del>10) the potential for custom-build and community-led housing schemes</del>	Community Land Trust	Clarification
MSC.4.124	H12 B	<del>B Generally, schemes consisting mainly of one-person units and/or one-bedroom units should be resisted.</del>	MHCLG	Clarification

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MSC.4.125	H12 D 1	1) <del>evidence of local housing needs, including the numbers and types of overcrowded and under-occupying households.</del>		Clarification
MSC.4.126	H12 D 2	2) <del>other the</del> criteria set out in part A, <b>including the strategic and local requirement for 2) — the local and strategic need for</b> affordable family accommodation		Clarification
MSC.4.127	H12 D 3 H12 D 4 H12 D 5	<del>3) Local issues of overcrowding</del> 4) <del>3)</del> the impact of welfare reform 5) <del>4)</del> the cost of delivering larger units and the availability of grant.		Clarification
MSC.4.128	H12 4.12.1	4.12.1 <b>The 2017 London Strategic Housing Market Assessment estimated the unit size mix of new homes required to meet London's current and projected housing needs. The main factors influencing this size mix include the projected growth in different household types and the substantial number of overcrowded households in London, whose needs</b>		Clarification

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		<p><b>can be addressed by providing family-sized homes but also smaller homes for concealed households to move into.</b> Table 4.3 shows the mix of homes identified in the <del>London 2017</del> Strategic Housing Market Assessment.</p> <p><i>(Note: Table 4.3 relocated from H7 to H12)</i></p>		
MSC.4.129	H12 4.12.2	4.12.2 ... Moreover, they do not necessarily meet the identified need for which they are being required; for example, larger <b>market</b> units are often required by boroughs in order to meet the needs of families but many such units are instead occupied by sharers.	GLA Labour Group	Factual update (intermediate homes cannot be occupied by sharers).
MSC.4.130	H12 4.12.3	<del>4.12.3 Family units have historically been considered to be those consisting of three or more bedrooms. However, as many families do live in two-bedroom units this should be taken into account when assessing the needs that different sized units can meet (in terms of bedrooms) and the design and approach</del>	GLA Housing Committee	Clarification

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		<del>to management of a development both for market and affordable housing.</del>		
MSC.4.131	H12 4.12.5	<del>4.12.5</del> While <b>one-bedroom units</b> play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes. <b>However</b> , one-person and one-bed units are the least flexible unit type <b>so schemes should generally consist of a range of unit sizes</b> . <del>Thus, unless supported by the borough as meeting an identified need, schemes consisting of over 10 units which mainly comprise of one-person/one-bed units should be avoided to ensure that there is a mix of unit sizes. Specific guidance on large-scale purpose-built shared living schemes can be found in <u>Policy H18 Large-scale purpose-built shared living</u>.</del>	MHCLG	Clarification
MSC.4.132	H12 4.12.6A	<b>4.12.6A The impact of this policy on the mix of homes in terms of numbers of bedrooms approved across London</b>	GLA Housing Committee	Clarification



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		<b>will be carefully monitored and assessed as part of the Annual Monitoring Report process. This will highlight any adverse impacts and identify if any revisions are necessary to the policy.</b>		
MSC.4.133	H12 4.12.7	<del>4.12.7 Houses in multiple occupation (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock. Their quality can, however, give rise to concern. Where they are of a reasonable standard they should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as local importance of HMOs.</del>		Readability
MSC.4.134	H13 A	A <del>To recognise that the Build to Rent development model differs from a</del>		Clarification

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		<del>traditional for sale scheme and the potential role it can play in accelerating delivery, where</del> <b>Where</b> a development meets the criteria set out <del>below in</del> <b>H13B</b> , the affordable housing offer can be solely Discounted Market Rent ( <b>DMR</b> ) at a genuinely affordable rent, preferably London Living Rent level. <del>Affordable housing</del> <b>DMR homes should must</b> be secured in perpetuity.		
MSC.4.135	H13 B	B To qualify as a Build to Rent scheme <del>within the context of this policy</del> , all the following criteria must be met:		Readability
MSC.4.136	H13 B 1 Footnote 53	<sup>53</sup> ... However, it is important that where a lower threshold is set, Build to Rent schemes must still operate according to the stipulations in this guidance <del>in order</del> to qualify for the application of the Built to Rent policy.		Readability
MSC.4.137	H13 B 3	B ... all the following criteria must be met: ... 3) a clawback mechanism is in place <del>to recoup additional affordable housing</del>		Consistency with other GLA strategies

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		<del>contributions in the event of the covenant being broken</del> <b>that ensures there is no financial incentive to break the covenant</b>		
MSC.4.138	H13 B 7	B ... all the following criteria must be met: ... 7) the scheme offers rent <b>and service charge</b> certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked	London Boroughs	Clarification
MSC.4.139	H13 C	C <del>For Build to Rent schemes to</del> <b>To</b> follow the Fast Track Route <del>they</del> , <b>Build to Rent schemes</b> must deliver at least 35 per cent affordable housing, <b>or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with <u>Policy E7 Industrial intensification, co-location and substitution.</u></b> <del>of which</del> <b>The Mayor</b>	London Boroughs	Clarification

EARLY SUGGESTED CHANGES TO THE DRAFT LONDON PLAN			MAYOR OF LONDON 2018	
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		<p><b>expects</b> at least 30 per cent <del>should be of DMR homes to be provided at an equivalent rent to</del> London Living Rent Level, with the <del>remainder being at a range of discounts below market rent to be agreed with the borough and/or the Mayor where relevant</del> <b>remaining 70 per cent at a range of genuinely affordable rents</b><sup>54A</sup>. Schemes must also meet all other requirements of part C of Policy H6 <u>Threshold approach to applications</u>. <del>This threshold and affordable housing tenure split, will be reviewed and if necessary updated in 2021, through Supplementary Planning Guidance.</del></p> <p><sup>54A</sup> <b>Boroughs may publish guidance setting out the proportion of DMR homes to be provided at different rental levels to benefit from the Fast Track Route. In setting local DMR requirements boroughs should have regard to the relationship between the level of</b></p>		
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		<b>discount required and the viability of achieving the relevant threshold level.</b>		
MSC.4.140	H13 4.13.1	4.13.1 <del>The planning system</del> <b>Boroughs</b> should take a <b>positive approach to the Build to Rent sector</b> to enable it to better contribute to the delivery of new homes...		Clarification
MSC.4.141	H13 4.13.4	4.13.4 ... London Living Rent has an advantage in that it has a London-wide electoral mandate, can be consistently understood and applied across London, can earn the public's trust as being genuinely affordable, and will be backed by the GLA who will uprate it every year. <b>DMR should be allocated according to intermediate eligibility criteria, which can include locally defined eligibility criteria. Where the borough has an intermediate or DMR waiting list they should agree with the applicant a process for providing priority access to the DMR units for those on the waiting list.</b>	London Boroughs	Clarification

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MSC.4.142	H13 4.13.6	4.13.6 To follow the <b>Fast Track Route schemes should provide the threshold level of DMR homes with</b> at least 30 per cent <del>of the affordable housing must be</del> let at London Living Rent levels. The remainder should be provided at a range of <b>genuinely affordable</b> discounts below market rent based on local need to be agreed with the borough and Mayor where relevant; <del>for example with half of remaining units at 50 per cent and half at 70 per cent of market rents.</del> <b>The thresholds and required discounts to market rent will be reviewed and if necessary updated in 2021 through Supplementary Planning Guidance.</b>		Clarification
MSC.4.143	H13 4.13.7	4.13.7 Proposals that do not provide 35 per cent affordable housing at the required discount to market rents, <b>or 50 per cent on public sector land, or 50 per cent on industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification,</b>		Clarification

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		<b><u>co-location and substitution where the scheme would result in a net loss of industrial capacity</u></b> , or that do not meet the criteria of part C of <u>Policy H6 Threshold approach to applications</u> will be subject to the <b>Viability Tested Route</b> under part E of <u>Policy H6 Threshold approach to applications</u> .		
MSC.4.144	4.13.12	4.13.12 Further support for Build to Rent can be given by boroughs through: ... <ul style="list-style-type: none"> <li>supporting institutional investment on public <b>sector</b> land, including exploring the use of joint ventures or deferred receipts.</li> </ul>		Clarification
MSC.4.145	H14 A	A The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of	Inclusion London	Clarification

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		London's population, including disabled Londoners (see <u>Policy D5 Accessible housing</u> ) <b>within a wider inclusive community setting</b> . Supported and specialised accommodation could include:		
MSC.4.146	H14 A 1	A ... Supported and specialised accommodation could include: 1) <del>move-on</del> accommodation for people leaving hostels, refuges and other supported housing, <b>as well as care leavers and people leaving prison</b> to enable them to live independently	LB Havering LB Redbridge London Assembly Planning Committee GLA Labour Group David Bonnet Associates	Clarification Lack of a definition for 'move on' accommodation so removed
MSC.4.147	H14 A 2	A ... Supported and specialised accommodation could include: ... 2) accommodation for young people <b>with support needs</b>	LB Camden Westminster City Council David Bonnet Associates	Clarification
MSC.4.148	H14 4.14.1	4.14.1 Boroughs should undertake <b>assessments of the need for short and long-term, medium-term and</b>	David Bonnet Associates	Clarification



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		<b>permanent needs for supported and specialised accommodation</b> within their borough...		
MSC.4.149	H14 4.14.1	4.14.1 ... For some groups, need may be best <b>assessed and</b> met on a multi-borough or pan-London basis.	GLA Labour Group	Clarification
MSC.4.150	H15 A 2	A Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of: ... 2) the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, access to <b>relevant facilities</b> , social infrastructure, health care and <del>public transport facilities are well served by public transport</del>	Age UK Just space Brentford Community Council London Forum of Amenity and Civic Societies	Clarification
MSC.4.151	H15 4.15.3	4.15.3 ... There is a range of specialist accommodation options and the following definitions should be applied in London: ... <ul style="list-style-type: none"><li><b>residential nursing care accommodation</b> (including end of</li></ul>	LB Sutton LB Bromley	Clarification.

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		<p>life/ hospice care, <b>nursing care units</b> and dementia care home accommodation) <b>should be considered as C2</b> as it provides <b>non-self-contained</b> residential accommodation for people <del>who</del> <b>require for whom</b> additional personal or nursing care <b>is essential</b>. <del>Rooms may be private or shared and may provide an ensuite bathroom.</del></p> <p>Communal facilities are likely to include a dining room and residents' lounge, with meals and personal services routinely provided to all residents. Personal or nursing care is a critical part of the accommodation package at residential/nursing care accommodation. Care homes are unlikely to provide more than 80 bed spaces in total.</p>		
MSC.4.152	H15 4.15.4	4.15.4 Research has identified a <b>total potential demand</b> in London across all tenures for just over 4,000 specialist older persons units a year between 2017	RB Kingston, LB Bromley, House Builders Federation	Clarification

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		and 2029. Table 4.4 provides <del>these requirements as</del> annual borough <del>indicative</del> benchmarks for specialist older persons housing (C3) 2017-2029.		
MSC.4.153	H15 4.15.7	4.15.7 <b>The fast track route for affordable housing delivery is available for specialist older persons housing providers. Where an application does not meet the requirements set out in part C of Policy H6 Threshold approach to applications it must follow the Viability Tested Route.</b> <del>Specialist older persons accommodation housing (C3) should provide affordable housing in line with <u>Policy H5 Delivering affordable housing and Policy H6 Threshold approach to applications</u>.</del> However, the <b>tenure split</b> requirements for specialist older persons <del>accommodation housing</del> may differ to those set out in <u>Policy H7 Affordable housing tenure</u> . Where they do, they should be clearly set out in <b>local</b> Development Plan Documents <del>or supplementary guidance</del> . <b>Specific</b>	LB Merton	Clarification

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		<p><b>tenure flexibility for small sites is provided in <u>Policy H2 Small sites and small housing developments and Policy H6 Affordable housing tenure</u>. Schemes meeting the threshold set out in <u>Policy H6 Threshold approach to applications</u> will be considered under the Fast Track Route, but developments not delivering this will be subject to the Viability Tested Route.</b></p>		
MSC.4.154	H15 4.15.8	<p>4.15.8 Specialist older persons housing developments should also provide a suitable level of <b>safe storage and charging facilities</b> for residents' mobility scooters, to prevent <del>them from being stored</del> <b>the storage of these</b> in communal corridors or spaces which are not designed <b>or suitable</b> for this purpose.</p>	Access Association, Withernay projects	Clarification
MSC.4.155	H15 4.15.10	<p>4.15.10 <b>Residential</b> <del>or</del> <b>nursing care accommodation</b> (C2) is an important element of the suite of accommodation options for older Londoners and this</p>	LB Sutton, LB Bromley	Clarification

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		should be recognised by boroughs and applicants. ...		
MSC.4.156	H16 B	B As of the start of this Plan period, boroughs should use the following definition of 'Gypsies and Travellers' as a basis for assessing need: People with a cultural tradition of nomadism, <b>a nomadic habit of life</b> , or living in a caravan, whatever their race or origin, including: ...	Advocacy groups for Gypsies and Travellers	Clarification
MSC.4.157	H16 C H16 D	C Boroughs that have not undertaken needs assessment since 2008 should <b>identify need by</b> either: 1) <del>undertake undertaking</del> a Gypsy and Traveller accommodation needs assessment within the first two years of this Plan period ( <del>based on the definition set out above</del> ) <b>using on the definition for Gypsies and Travellers set out above</b> ; or 2) use the <del>midpoint</del> figure of need <b>for Gypsy and Traveller accommodation</b>	Advocacy groups for Gypsies and Travellers, Just Space London Gypsies & Travellers Unit	Clarification

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		<p><del>provided</del> in Table <del>3</del> <b>4.5</b> of <del>GLA Gypsy and Traveller Accommodation Topic Paper 2017</del> as identified need for pitches (over the next 10 years) until a needs assessment is undertaken as part of their Development Plan review process.</p> <p>D Boroughs that have undertaken a needs assessment since 2008 should update this (based on the definition set out above) as part of their Development Plan review process.</p>		
MSC.4.158	H16 E	<p>E Boroughs should undertake an audit of existing <b>local authority provided Gypsy and Traveller pitches and sites and pitches, working with residents occupying these</b>, identifying: ...</p> <p>3) pitches in need of refurbishment <b>and/ or provision of enhanced infrastructure (including utilities, open space and landscaping)</b>.</p>	Kent County Council, Just Space	Clarification
MSC.4.159	H16 F	<p>F Boroughs should actively plan to protect existing Gypsy and Traveller</p>	Advocacy groups for Gypsies and Travellers, LB Enfield	Clarification

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		<p><del>accommodation and Travelling Showpeople or circus people pitch or plot</del> capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.</p>		
MSC.4.160	H16 4.16.2	<p>4.16.2 ... This is due to concerns that the existing Government planning definition does not recognise many Gypsies and Travellers, for example:</p> <ul style="list-style-type: none"> <li>• due to their own or their family's or dependants' educational or health needs or old age. This is most likely to affect Gypsies and Travellers who face multiple and intersecting inequalities (for example older people, disabled Gypsies and Travellers, women and single <del>mothers-parents</del>).</li> </ul>	London Forum of Amenity and Civic Societies	Clarification

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MSC.4.161	H16 4.16.4	4.16.4 This often results in <b>Gypsies and Travellers not being recognised or counted in needs assessments</b> , with many needs assessments identifying zero need. This has a direct impact on the <del>housing</del> <b>accommodation</b> options available to Gypsies and Travellers, their ability to retain their cultural status and identity, and can lead to greater inequalities in terms of access to safe and secure accommodation, health care and education.	Advocacy groups for Gypsies and Travellers	Clarification
MSC.4.162	H16 4.16.8	4.16.8 To assist boroughs in meeting identified need, <b>Mayoral funding</b> will be available through the Homes for Londoners <del>2016-21</del> Affordable Homes Programme for the provision of new pitches, on a single or multi- borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches.		Factual update
MSC.4.163	H16 4.16.8A	<i>Moved from 4.16.10</i>		Readability



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		<b>4.16.8A</b> Where <b>new Gypsy and Traveller pitches</b> are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.		
MSC.4.164	H16 4.16.9	4.16.9 If existing <b>Gypsy and Traveller pitches or Travelling Showpeople's or circus people's sites or plots</b> have to be <b>re-located or re-provided</b> within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. <del>The community</del> <b>Residents occupying pitches, sites or plots</b> should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved, <b>and replacement accommodation should be secured before relocation takes place.</b>	Advocacy groups for Gypsies and Travellers, Gypsies & Travellers Community Law Partnership Solicitors	Clarification

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MSC.4.165	H16 4.16.10	<i>Moved to new 4.16.8A</i> <del>4.16.10</del> Where <b>new pitches</b> are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.		Readability
MSC.4.166	H16 Table 4.4A	<i>Insert new Table 4.4A (see appendix)</i>	Advocacy groups for Gypsies and Travellers, Just Space, London Gypsies & Travellers	Clarification
MSC.4.167	H17 Throughout policy and supporting text	<i>Change all references of:</i> higher education institution/ institutions <i>to:</i> higher education <b>provider/ providers</b>	London Higher Education Providers, NUS, University of London	Clarification
MSC.4.168	H17 A 2	A Boroughs should seek to ensure that local and strategic need for purpose-built	London Forum of Amenity and Civic Societies, individuals	Clarification

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		<p>student accommodation is addressed, provided that: ...</p> <p>2) the use of the accommodation is secured for students<sup>59A</sup></p> <p><b><sup>59A</sup> For the implementation of this policy a student is a person following a course in higher education as recognised by the Office for Students.</b></p>		
MSC.4.169	H17 A 3	<p>A Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that: ...</p> <p>3) the accommodation is secured <b>through a nomination agreement</b> for occupation by <del>students-members</del> of one or more <del>specified</del> higher education <b>provider</b><sup>59B</sup> <del>institutions</del></p> <p><b><sup>59B</sup> A higher education provider is defined as an education institution that provides a designated course that has been approved by the Department for Education for higher education study</b></p>	Higher education providers, British Property Federation', London Boroughs, Individuals	Clarification

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		<p><b>which allows the student to apply for government-financed student loans. Higher education study is at qualification Level 4 or above (i.e. above A-level or equivalent). Further information on qualification levels can be found here: <a href="https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels">https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels</a>. The Office for Students provides a register listing all the English higher education providers that it officially recognises, which can be found here <a href="http://www.officeforstudents.org.uk/advice-and-guidance/the-register/the-ofs-register/">www.officeforstudents.org.uk/advice-and-guidance/the-register/the-ofs-register/</a>. This register can be used to determine if a higher education provider deliver designated courses and thus satisfies the above definition. Further advice on higher education providers and designated courses can be obtained by contacting London Higher at <a href="mailto:enquiry@londonhigher.ac.uk">enquiry@londonhigher.ac.uk</a>.</b></p>		
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MSC.4.170	H17 A 4	<p>A Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that: ...</p> <p>4) <del>at least 35 per cent of the maximum level of</del> accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance,</p> <p><b>a) to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with <u>Policy E7 Industrial intensification, co-location and substitution</u></b></p> <p><b>b) where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in <u>Policy H6 E Threshold approach to applications.</u></b></p>	London Boroughs, Higher education providers	Clarification
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MSC.4.171	H17 B Part B	B Boroughs, student accommodation providers and higher education <b>providers institutions</b> are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, <del>but away from existing concentrations in central London</del> as part of mixed-use regeneration and redevelopment schemes.	Higher education providers, Tide Construction Ltd, Get Living London, London First, Watkin Jones Group, Unite Students	Clarification
MSC.4.172	H17 4.17.2	4.17.2 The <b>overall strategic requirement for PBSA</b> in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified <sup>59C</sup> .  <sup>59C</sup> <b>Student population projections and accommodation need for new London Plan 2017. GLA</b>		Factual update
MSC.4.173	H17 4.17.3	... development must have an <del>undertaking agreement</del> in place from initial occupation <b>with one or more higher</b>	Higher education providers, British Property Federation,	Clarification

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		<p><b>education providers</b>, to provide housing for <b>its</b> students <del>at one or more specified higher education institutions,</del> <b>and to commit to have such an agreement</b> for as long as the development is used for student accommodation. <b>This agreement is known as a nomination agreement.</b> A majority of the bedrooms in the development must be covered by <del>such an undertaking</del> <b>these agreements</b>. Therefore, the borough should ensure, through condition or legal agreement, that the development will, <b>from the point of occupation,</b> <del>continue to</del> maintain a <del>nomination</del> <b>agreement</b> or enter <b>a</b> new nomination agreements with one or more <del>specified higher</del> <b>education provider institution</b>(s) for a majority of the bedrooms in the development, for as long as it is used as student <del>accommodation or such time period as the borough considers is appropriate.</del> There is no requirement for the higher education <b>provider institution</b> linked by</p>	London Boroughs, Individuals	
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		the agreement to the PBSA to be located within the borough where the development is proposed.		
MSC.4.174	H17 4.17.3A	<b>4.17.3A Where all the bedrooms in the PBSA development are provided at a rental cost that qualify as affordable student accommodation as defined in paragraph 4.17.7 and maintained in perpetuity through legal agreement or condition, there is no requirement for it to have a nomination agreement with a higher education provider.</b>	British Property Federation, NUS, London Higher, Cass and Claredale Halls.	Clarification
MSC.4.175	H17 4.17.4	4.17.4 If the accommodation is not secured for use by students and <b>secured through a nomination agreement</b> for occupation by <b>students members</b> of one or more <del>specified</del> higher educational <b>providers institutions</b> as set out in paragraph <b>4.17.3 or is exempt from this requirement as set out in paragraph 4.17.3A</b> <u>Policy H18</u> <del>Large scale purpose built shared living,</del>	British Property Federation, NUS, London Higher, Cass and Claredale Halls.	Clarification



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		it will not be considered as purpose-built student accommodation or meeting a need for purpose-built student accommodation; and the development proposal will <b>normally</b> be considered <b>large-scale purpose-built shared living</b> and be assessed by the requirements of <u>Policy H18 Large-scale purpose-built shared living</u> .		
MSC.4.176	H17 4.17.6	4.17.6 To ensure students with an income equivalent to that provided to full-time UK students by state-funded sources of financial support for living costs can afford to stay in PBSA, <b>the maximum level</b> <del>a proportion (35 per cent)</del> of bedrooms in PBSA are required to be affordable at this income level.	London Boroughs, Higher education providers	Clarification
MSC.4.177	H17 4.17.8	4.17.8 <b>To provide greater certainty, speed up the planning process and increase the delivery of affordable student accommodation a threshold has been introduced for PBSA schemes to take advantage of the Fast Track Route. To follow the Fast Track Route t</b> <del>The</del>	London Boroughs, Higher education providers	Clarification

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		<b>amount of affordable student accommodation</b> provided <del>in a development</del> should be <b>at least</b> 35 per cent of student bedrooms in the development <b>or 50 per cent where required by part A4a of Policy H17</b> . If <del>35 per cent</del> <b>the required threshold for</b> affordable student accommodation is not met, a scheme will be considered under the <b>Viability Tested Route</b> in line with part E of <u>Policy H6 Threshold approach to applications</u> and the Mayor's Affordable Housing and Viability SPG.		
MSC.4.178	H17 4.17.11	4.17.11 ... affordable student accommodation bedrooms should be part of the PBSA that is subject to a nomination <del>s</del> agreement. ...		Readability
MSC.4.179	H17 4.17.12	4.17.12 To enable providers of PBSA to maximise the delivery of affordable student accommodation by increasing the profitability of the development, boroughs should consider allowing the <b>temporary use of accommodation</b> during vacation periods for ancillary	Higher education providers, British Property Federation, NUS	Clarification

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		<p>uses. Examples of such uses, amongst others, include providing accommodation for conference delegates, <b>visitors</b>, interns on university placements, and students on short-term education courses at any institution approved in advance by the borough. <b>The temporary use should not disrupt the accommodation of the resident students during their academic year.</b> Conditions and/or legal agreements could be attached to any planning permission to ensure that the ancillary use does not result in a material change of use of the building.</p>		
MSC.4.180	H17 4.17.13A	<b>4.17.13A In monitoring the implementation of this policy, particular regard will be given to the delivery of PBSA, the amount of affordable student accommodation provided, and the rental costs of the non-affordable rooms in PBSA developments.</b>	London Boroughs, London Councils, Higher education providers, NUS, Unite Students, community groups, London Assembly Planning Committee	Clarification

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MSC.4.181	H18 A	Large-scale purpose-built shared living <del>Sui Generis use</del> development <sup>61A</sup> <del>s, where of good quality and design, may have a role in meeting housing need in London if, at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood,</del> and it <b>must</b> meets <del>all</del> the following criteria: ...  <b>61A Large-scale purpose-built shared living developments are sui generis use class</b>	London Boroughs	Clarification
MSC.4.182	H18 A 1	A ... the following criteria: 1) <del>it meets an identified need</del> <b>it is of good quality and design</b>	London Boroughs	Clarification
MSC.4.183	H18 A 1A	A ... the following criteria: ... <b>1A it contributes towards mixed and inclusive neighbourhoods</b>		Clarification
MSC.4.184	H18 A 5	A ... meets all the following criteria: ... 5) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and <del>include</del> <b>offer</b> at least: ...	Developers	Clarification

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MSC.4.185	H18 A 5 F	A ... meets all the following criteria: ... <del>f) community management</del>	Developers	Clarification
MSC.4.186	H18 A 6	A ... meets all the following criteria: ... 6) the private units provide adequate functional living space and layout, and <del>are demonstrably not C3 Use Class accommodation</del> <b>are not self-contained homes or capable of being used as self-contained homes</b>	London Boroughs	Clarification
MSC.4.187	H18 A 8	A ... meets all the following criteria: ... 8) In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the <del>residential</del> units, <b>or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with <u>Policy E7 Industrial intensification, co-location and substitution</u></b> , to be provided at a discount of 50 per cent of the market rent. <del>If a lower contribution is proposed the scheme</del> <b>All large-scale purpose-built shared living schemes</b>	London Boroughs	Clarification Clarification

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		will be subject to the Viability Tested Route set out in <del>part E of</del> <u>Policy H6 Threshold approach to applications,</u> <b>however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent, or 50 per cent of the units at a discount of 50 per cent of the market rent where the development is on public sector or industrial land, will not be subject to a Late Stage Viability Review.</b>		
MSC.4.188	H18 4.18.1	<b>4.18.1 Large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. This policy is required to ensure that new purpose-built shared living developments are of acceptable quality, well-managed and integrated into their surroundings.</b>	London Boroughs	Clarification

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MSC.4.189	H18 4.18.1A	<b>4.18.1A</b> This policy applies to large-scale purpose-built shared living developments ...		Clarification
MSC.4.190	H18 4.18.2	<del>4.18.2 Development proposals for such schemes should only be supported where they meet an identified market need.</del>	London Boroughs	Clarification
MSC.4.191	H18 4.18.3	<del>4.18.3 To qualify as</del> <b>Large-scale purpose-built shared living developments</b> , <del>the development, or block or phase within a development must be</del> <b>are generally</b> of at least 50 units. This type of accommodation is seen as providing an alternative to traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen, on-site gym and concierge service. <del>To ensure this form of accommodation is meeting its specific housing need, it is important that it does not effectively become a hostel, so</del> <del>t</del> Tenancies should be for a minimum of three months <b>to ensure large-scale</b>		Clarification

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		<b>purpose-built shared living developments do not effectively operate as a hostel.</b>		
MSC.4.192	H18 4.18.4	4.18.4 ... The agreed management plan should be secured through a Section 106 agreement and should include, but not be limited to, detailed information on: ... <del>f. on-site staff and their responsibilities</del> <del>g. with reference to the on-site staff, what internal community events will take place and how the surrounding community will be engaged.</del>	Developers	Clarification
MSC.4.193	H18 4.18.5	4.18.5 ... Buildings should be designed and managed in a way that lowers barriers to social interaction and encourages engagement between people:  ● <del>an on-site community manager should help to organise events to encourage social interaction between residents.</del>	Developers	Clarification
MSC.4.194	H18	4.18.6 The private units should be appropriately sized to be comfortable	London Boroughs	Clarification



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	4.18.6	and functional for a tenant's needs and may include facilities such as en-suite bathrooms and <del>kitchenettes</del> <b>limited cooking facilities</b> . There are currently no minimum space standards for <del>these units</del> <b>communal and private areas of this type of accommodation</b> . ...		
MSC.4.195	H18 4.18.8	4.18.8 A borough can decide whether it would prefer the financial contribution as a single upfront payment for affordable housing (part A8a of <u>Policy H18 Large-scale purpose-built shared living</u> ), which will be based on a 50 per cent discount to market value of 35 per cent of the units, <b>or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with <u>Policy E7 Industrial intensification, co-location and substitution</u><sup>62</sup></b> , or an ongoing in perpetuity payment linked to actual rental income (part A8b of <u>Policy H18 Large-scale purpose-built shared living</u> ). The ongoing payment should be	London Boroughs	Clarification

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		<p>based on 50 per cent of rental income for 35 per cent of units for as long as the development is used for this form of accommodation. <del>If these affordable housing contribution requirements are not met, the scheme will be considered under the Viability Tested Route in line with part E of <u>Policy H6 Threshold approach to applications</u> and the Mayor's Affordable Housing and Viability SPG. Because of the immaturity of the market for this type of development, all large-scale purpose-built shared living developments will be assessed under the Viability Tested Route as set out in <u>Policy H6 Threshold approach to applications</u>. However, schemes which meet the relevant threshold will not be subject to a Late Stage Viability Review.</del></p> <p><sup>62</sup><del>Evidence of the market value of the shared living units will need to be provided under the Fast Track Route to enable the upfront payment to be calculated.</del></p>		
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MSC.4.196	H18 4.18.9	4.18.9 The <b>rental cost</b> of this form of accommodation is not directly comparable to the rental costs of conventional Use Class C3 housing as <b>shared living</b> units are significantly smaller than the minimum housing space standard i.e. a one person dwelling of 37 sqm. <b>Shared living tenants typically pay a room rate that includes utility costs and rent.</b> If a comparison is undertaken it should be on a square metre rental rate, <b>excluding utility costs</b> , of the private accommodation and not a unit rental rate.	Developers	Clarification
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Chapter 5 Social Infrastructure				
MSC.5.1	S1 A	A Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities. <b>Assessments should consider the need for cross-borough collaboration where appropriate.</b>	London Boroughs	Clarification
MSC.5.2	S1 E	E New facilities should be easily accessible by public transport, cycling and walking. <b>and should be encouraged in high streets and town centres.</b>	Vital OKR	Consistency with SD6 I
MSC.5.3	S1 F	F Development proposals that would result in a loss of social infrastructure in an area of defined need <b>as identified in the borough's social infrastructure needs assessment required under Part A</b> should be refused unless:	LB Merton	Clarification

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MSC.5.4	S1 F 1	F ..... needs assessment required under Part A should be refused unless:  1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood <b>and wider community</b> , or;	LB Islington LGBTQ+ Community	Clarification
MSC.5.5	S1 F 2	F ..... needs assessment required under Part A should be refused unless:  2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities <del>in order</del> to meet future population needs or to sustain and improve services.		Readability
MSC.5.6	S1 G	G Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, <b>unless this loss is part of a wider public service transformation plan (See Part F2).</b>	London Boroughs Office of London CCGs	Clarification

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MSC.5.7	S1 Paragraph 5.1.1	5.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, <b>early years</b> , recreation, sports, faith, <b>criminal justice</b> and emergency facilities. Green infrastructure in all its forms is also a key component of social infrastructure, and is addressed separately in Chapter 8, <u>Policy G3 Metropolitan Open Land</u> and <u>Policy G4 <del>Local green and o</del>Open space</u> .	Residents of the Corney Reach Estate, Chiswick	Clarification
MSC.5.8	S1 Paragraph 5.1.6	5.1.6 .....Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with parts D and F of Policy S1 Developing London's social infrastructure and Policy S2 Health and social care facilities and any related information or guidance <del>in order</del> to achieve the overall aims of the programme and to continue to meet the needs of Londoners.		Readability

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MSC.5.9	S1 Paragraph 5.1.7	5.1.7 In all cases, where housing is considered <del>to be</del> an appropriate alternative use, opportunities for <b>affordable housing provision</b> should be maximised.		Readability
MSC.5.10	S1 Paragraph 5.1.8A	<b>5.1.8A</b> It is <b>also</b> important to consider the way that social infrastructure integrates with other facilities and the way people who live or work in the area <del>might</del> want to access it. <b>Shared use and co-location of facilities</b> should be encouraged, <del>in order</del> to align service provision, use land more efficiently and facilitate opportunities for different groups of people to come together, encouraging further inclusion and community participation. Shared use and co-location <del>will also</del> help facilities and service providers <del>to work</del> in a more coherent and joined-up way, and share maintenance and management costs. It could <del>also potentially</del> reduce the need to travel thereby improving accessibility.		
MSC.5.11	S2 A 2	A Boroughs should work with Clinical Commissioning Groups (CCGs) and		Readability

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		<p>other NHS and community organisations to:</p> <p>2) Understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision <del>in-order</del> to maximise health and social care outcomes.</p>		
MSC.5.12	S2 A 4	<p>A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:</p> <p>4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision <b>and to address needs across borough boundaries.</b></p>	National Health Services England, National Health Services Improvement, Community Health Partnerships	Clarification
MSC.5.13	S2 B	<p>B Development proposals that support the provision of high-quality new and enhanced <b>health and social care</b> facilities to meet identified need and new models of care should be supported.</p>	London Boroughs	Clarification



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MSC.5.14	S2 Footnote 63	63 <a href="http://content.digital.nhs.uk/catalogue/PUB23046/nhs-work-stat-oct-2016-pdf.pdf">http://content.digital.nhs.uk/catalogue/PUB23046/nhs-work-stat-oct-2016-pdf.pdf</a> <b>NHS Workforce Statistics, April 2018</b> <a href="https://digital.nhs.uk/data-and-information/publications/statistical/nhs-workforce-statistics/nhs-workforce-statistics---april-2018">https://digital.nhs.uk/data-and-information/publications/statistical/nhs-workforce-statistics/nhs-workforce-statistics---april-2018</a>		Factual Update
MSC.5.15	S2 Paragraph 5.2.2	5.2.2 The NHS Five Year Forward View identifies the need to <b>prevent avoidable illness and transform the way that care is organised and delivered</b> <del>in order</del> to meet increasing demands for healthcare within the resources available.		Readability
MSC.5.16	S2 Footnote 64	64 <b>General Practice Forward View, NHS England, 2016</b> <a href="https://www.england.nhs.uk/wp-content/uploads/2016/04/gpfv.pdf">https://www.england.nhs.uk/wp-content/uploads/2016/04/gpfv.pdf</a>		Factual Update
MSC.5.17	S2 Paragraph	5.2.6 In <b>assessing the need for new health and social care facilities</b> , consideration should be given to the		Readability

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	5.2.6	location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all- <del>of the</del> growth.		
MSC.5.18	S2 Paragraph 5.2.7	5.2.7 Where population growth and change is taking place at <del>fairly</del> modest levels, it may be possible to accommodate this through a combination of <b>efficiency savings, service reconfiguration and small adjustments in capacity</b> , for example, through the conversion of non-clinical space to consulting or treatment rooms.		Readability
MSC.5.19	S3 A 1	A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:  1) identify and address local <b>education and childcare facility</b> needs and any shortages in supply, both locally and	MHCLG	Clarification

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		sub-regionally, including cross-boundary issues <b>within Development Plans.</b>		
MSC.5.20	S3 A 2	A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:  2) identify sites for future provision through the <del>Local Plan</del> <b>Development Plan</b> process, particularly in areas with significant planned growth and/or need		Consistency
MSC.5.21	S3 B 4	B Development proposals for education and childcare facilities should:  4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to <del>encourage</del> <b>enable all children to travel actively to school (walk, cycle or travel by public transport)</b> <del>walking and cycling</del>		Clarification

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MSC.5.22	S3 B 6	B Development proposals for education and childcare facilities should:  6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, <b>and between early years and health and social care providers.</b>	LB Islington	Clarification
MSC.5.23	S3 Paragraph 5.3.2	5.3.1 <b>Access to affordable, accessible and high- quality childcare</b> (pre-school and school age) provision can play a significant role in....		Correction
MSC.5.24	S3 Paragraph 5.3.3  Footnote 65	5.3.3 It is estimated that an additional <b>100,000</b> <del>71,000</del> <b>childcare places</b> are needed between 2016 – 2041 <sup>65</sup> . The Childcare Act 2006 places a duty on local authorities to ensure that there are enough childcare places to enable parents to work .....  65- <del>Childcare</del> <b>Demand for childcare in London – drivers and P</b> rojections ( <del>2017</del> <b>March 2018</b> ) GLA <del>Intelligence Unit</del> <b>Economics.</b>		Factual Update

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MSC.5.25	S3 Paragraph 5.3.5 Footnote 66	<p>5.3.5 There is a <b>growing need for school places</b> in London, with projected demand for <b>705,000 state maintained primary school places for the academic year 2018/19. This is an increase of 7,000 over the number of places required in 2016/17. The level of need is projected to fall to 686,000 places a year by 2027/28. In 2016/17, there was a need for 403,000 places in state maintained secondary schools. The number of places required is projected to increase by 65,000, over the period to 2027/28</b> <del>an additional 60,000-67,000 primary school places and 105,000-122,000 secondary school places in state maintained schools up to 2025</del><sup>66</sup>.</p> <p><sup>66</sup> <del>Projected Demand for School Places (2015)</del> <b>2018 GLA School Place Demand Projections (2018)</b> GLA Intelligence Unit</p>		Factual Update
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MSC.5.26	S3 Paragraph 5.3.6  New Footnote 66A	5.3.6 ..... It is important that all schools are designed to be accessible and inclusive, meeting the highest standards of accessible and inclusive design (see <u>Policy D3 Inclusive design <b>and Area guidelines for SEND and alternative provision: BB104<sup>66A</sup></b></u> ).  <sup>66A</sup> <b>Department for Education and Education Funding Agency SEND and alternative provision: area guidelines <a href="https://www.gov.uk/government/publications/send-and-alternative-provision-area-guidelines">https://www.gov.uk/government/publications/send-and-alternative-provision-area-guidelines</a></b>	MHCLG	Clarification
MSC.5.27	S4 A 1	A Boroughs should:  1) undertake audits of existing <b>children and young person's</b> play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision	LB Merton	Clarification

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MSC.5.28	S4 B 5	<p>B Development proposals for schemes that are likely to be used by children and young people should:</p> <p>5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. <b>Where published, a borough's play and informal recreation strategy should be used to identify ongoing or future demand for play provision.</b></p>	LB Southwark	Clarification
MSC.5.29	S4 Paragraph 5.4.5	<p>5.4.5 Formal play provision should normally be made <b>on-site</b> <del>and in accordance with Development Plans' play policies for the area, using a benchmark of</del> <b>and provide at least</b> 10 square metres per child <del>to address as a basis for assessing future requirements arising from a projected increase in the</del> child <b>occupancy and play space requirements generated by a development proposal</b> <del>population of the area.</del> Supplementary Planning</p>	London Boroughs	Clarification

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		Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.		
MSC.5.30	S5 A	A <del>In order to</del> To ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:		Readability
MSC.5.31	S5 A 3	A <del>In order to</del> To ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:  3) maintain, <del>and</del> promote <b>and enhance networks for walking, cycling and other activities including</b> the Walk London Network shown on Figure 5.1 <del>and encourage networks for walking, cycling and other activities.</del>	Canal & River Trust/Internal	Clarification
MSC.5.32	S5 B 2	B Development proposals for sports and recreation facilities should:	Kingston University	Clarification



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		2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, <b>universities</b> and other community facilities		
MSC.5.33	SD5 B 4	B Development proposals for sports and recreation facilities should:  4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand. <b>Where published, a borough's assessment of the need for sports and recreation facilities should be used to identify ongoing or future demand.</b>	London Assembly Planning Committee	Clarification
MSC.5.34	SD5 C	C) Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space ( <u>Policy <b>G2 London's Green Belt</b>, G3 Metropolitan Open Land and <b>G4 Open Space</b></u> ) and the borough's	London Boroughs	Factual correction

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		own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.		
MSC.5.35	SD5 Paragraph 5.5.3	5.5.3 ..... Built sports facilities should only be accommodated on green open space if that area has been identified as surplus to requirements as per an open space strategy <b>or the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss of green open space.</b>	Sport England	Clarification and consistency
MSC.5.36	S6 A	A Development proposals that include large-scale <del>commercial</del> developments that are open to the public, such as shops, <b>sport, leisure and health care facilities, transport hubs, cultural and civic buildings,</b> and large areas of public realm, should provide and secure the future management of free publicly-accessible toilets. These should be available during opening hours, or 24 hours a day in areas of public realm, and	LB Newham, Just Space & Soho Society	Clarification

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		should be suitable for a range of users including disabled people, <del>and</del> families with young children <b>and people of all gender identities.</b>		
MSC.5.37	S6 A	A .....These should be available during opening hours, or 24 hours a day in areas of public realm, and should be suitable for a range of users including disabled people, <del>and</del> families with young children <b>and people of all gender identities.</b>	Women's Resource Centre, Individuals	Clarification
MSC.5.38	S6 B	B <del>Larger developments</del> <b>Development proposals</b> where users are expected to spend long periods of time or where there is no other local provision, <b>and those defined in Part A</b> , should <del>also</del> provide 'Changing Places' toilets <b>in accordance with the guidance in as identified in the</b> British Standard BS8300-2:2018.	LB Enfield, Westminster CC, LB Hillingdon, LB Southwark, Access Association, Centre for Accessible Environments	Clarification

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MSC.5.39	S6 Paragraph 5.6.2	5.6.2 Public toilets should be provided as part of <b>large-scale commercial developments</b> that are open to the public. Boroughs should define 'large-scale' for their local circumstances. <b>Where no local definition is given, 'large-scale' should be taken to mean developments that come under Category 1B, Part 1 of The Town and Country Planning (Mayor of London) Order 2008.</b>	Silvertown Homes, Redrow Homes, LB Enfield	Clarification
MSC.5.40	S6 Paragraph 5.6.2A	<b>5.6.2A In smaller developments and subject to local evidence and development plan policy, boroughs may secure access to toilet facilities as part of a community toilet scheme, or secure provision of public toilets through CIL or planning obligations.</b>	LB Southwark	Clarification
MSC.5.41	S6 Paragraph 5.6.3	5.6.3 Taking into account the needs of all Londoners <b>and to provide suitable levels of choice, a range of toilet facilities</b> should be provided. They should include unisex disabled persons'	LB Enfield	Clarification

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		toilets, separate accessible baby change/family toilets, and cubicles for people with ambulant mobility impairments which can also be suitable for some older people or people who require additional space.		
MSC.5.42	S6 Paragraph 5.6.3	5.6.3 .....Further guidance on the provision and design of these facilities can be found in British Standard BS8300- <b>2:2018 (Design of an accessible and inclusive built environment, Part 2: Buildings – Code of practice). Where gender-specific toilets are provided, a gender-neutral option should also be provided wherever possible (in addition to unisex disabled persons toilets).</b> <del>Consideration should also be given to the provision of gender-neutral toilets.</del>	Women’s Resource Centre, Individuals	Clarification
MSC.5.43	S6 Paragraph 5.6.5	5.6.5 Public toilet facilities, whether provided inside buildings or externally, should be safe, <b>well-lit</b> and clean.	LB Southwark	Clarification

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MSC.5.44	S6 Paragraph 5.6.7	5.6.7 <b>Further guidance</b> on <del>the types of development where it would be appropriate to provide a</del> Changing Places toilets <b>s</b> can be found in British Standard BS8300-2:2018.		Clarification
MSC.5.45	S7 C	C Development proposals for new cemetery provision should be supported. This may include provision in one borough to assist faith groups from another borough <b>that are</b> facing burial space shortages.		Clarification
MSC.5.46	S7 Paragraph 5.7.1	5.7.1 ..... In London, the demand for burial space for particular faith groups is not always well matched with the availability of burial space. Some boroughs have little or no burial space available <sup>70</sup> . For inner <del>and central</del> London boroughs, this requires them to seek provision in outer London or beyond. This can cause problems of access and cost which has a disproportionate effect on London's poorest communities. It also risks undermining community cohesion and		Clarification

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		social integration. <del>The Mayor favours</del> <b>To address these issues</b> , the principle of proximity <b>is supported</b> as a general rule., <del>but</del> <b>However</b> , there may be cases where meeting the needs of residents in one borough may require burial provision to be located in another borough.		
MSC.5.47	S7 Paragraph 5.7.2	5.7.2 The re-use of graves can provide some additional capacity. Both Section 74 of the Local Authorities Act 2007 and Section 25 of the Burial Act 1857 allow for the re-use of graves in certain circumstances and boroughs are encouraged to actively examine the potential that re-use offers them. <b>The unique heritage and archaeological qualities of cemeteries should be taken into account when providing additional capacity in existing cemeteries.</b>	Historic England	Clarification

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MSC.5.48	S7 Paragraph 5.7.3	5.7.3 Ensuring that community and cultural facilities and services required to meet local needs are planned for and provided is one of the core principles of the planning system. <del>Provision of facilities for cemeteries may not be inappropriate development in the Green Belt or on Metropolitan Open Land as long as it preserves the openness and does not conflict with the purposes of including land within it.</del> <b>The construction of new buildings in the Green Belt is inappropriate except for a limited number of uses. These include provision of appropriate facilities for cemeteries as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. This also applies to Metropolitan Open Land.</b>		Clarification
MSC.5.49	S7 Paragraph 5.7.5	5.7.5 Boroughs should continue to make traditional burial provision <b>but innovative approaches</b> to the provision of community burial space, particularly in		Clarification



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		inner <del>and central</del> London, may also need to be taken.		
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Chapter 6 Economy				
MSC.6.1	E1 A	A Improvements to the <del>competitiveness and</del> quality, <b>flexibility and adaptability</b> of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.	City of London, Just Space, LB Islington, London Property Alliance, London Tenants Association	Clarification
MSC.6.2	E1 B	B Increases in the current stock of offices should be supported <b>in the locations in Parts C and D below</b> , <del>where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 2041 in Table 6.1.</del>	London First, LB Islington, Lewisham, Merton, Redbridge and Sutton; L&Q, Redrow Homes London, Silvertown Homes	Clarification
MSC.6.3	E1 C	C ... and other nationally-significant office locations (such as Tech City, <b>and</b> Kensington & Chelsea <del>and the Royal Decks Enterprise Zones</del> ), should be developed and promoted...		Clarification

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MSC.6.4	E1 D	D The diverse office markets in outer and inner London (outside the <b>areas identified in Part C CAZ and NIOD</b> ) should be consolidated and - where viable - extended...	LB Hackney	Clarification
MSC.6.5	E1 E	E Existing viable office floorspace capacity in <del>outer and inner London</del> locations outside the <b>areas identified in Part C CAZ and NIOD</b> should be retained...	LB Hackney, LB Merton	Clarification
MSC.6.6	E1 F	F Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ, NIOD, Tech City, <del>the Royal Docks Enterprise Zones</del> , Kensington & Chelsea and geographically-defined parts of other existing and viable strategic and local office clusters...		Clarification
MSC.6.7	E1 Paragraph 6.1.3	6.1.3 The projections indicate that the CAZ boroughs and some parts of <b>inner London</b> will continue to see growth in office employment and development of new office floorspace, driven by agglomeration economies, high value-added activities and viability of new space. There is broadly	LB Islington	Clarification

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		sufficient capacity to accommodate this demand in the CAZ and Northern Isle of Dogs <sup>73</sup> complemented by Tech City and Kensington & Chelsea, <b>although there are sub-markets within these areas where demand may exceed capacity<sup>73</sup>.</b> <del>with</del> Stratford and Old Oak Common <b>are</b> identified as potential future reserves for CAZ-related office capacity.		
MSC.6.8	E1 Paragraph 6.1.6	6.1.6 Outside the office to residential permitted development rights (PDR) exemption areas, more than 1. <del>96</del> million sqm of office space had received prior approval to change to residential by March 201 <del>86</del> <sup>74</sup> mostly, but not exclusively, in town centres in west and south London and in areas around the CAZ fringe...		Factual update
MSC.6.9	E1 Paragraph 6.1.6	6.1.6 ... This Plan therefore supports boroughs to consult upon and introduce Article 4 Directions for the areas currently exempted in and around the CAZ ( <del>see Policy SD2 Collaboration in the Wider South East</del> )...		Factual update

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MSC.6.10	E1 Paragraph 6.1.6	6.1.6 ... and for geographically-defined parts of other existing and viable strategic and local office <b>locations</b> <del>clusters</del> ,...	Jessica Ferm	Clarification
MSC.6.11	E1 Paragraph 6.1.6	6.1.6 ... to ensure that their office functions are not undermined by office to residential PDR <b>and to protect local amenity or the wellbeing of an area.</b>	MHCLG	Clarification
MSC.6.12	E1 Paragraph 6.1.6A	<i>Insert new paragraph 6.1.6A</i> <b>6.1.6A Surplus office space includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local development plan document). This evidence should be used to inform viability assessments.</b>	London Boroughs, London Councils, Federation of Small Businesses	Clarification

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MSC.6.13	E2 B	B Development proposals that involve the loss of existing B1 space (including creative and artists' <b>studio workspace</b> ) in areas where there is an identified shortage of lower-cost space should:	London First, British Property Federation	Clarification
MSC.6.14	E2 B	<i>Combine B 2 and B 3 and add text from 6.2.4</i> B ...areas where there is an identified shortage of lower-cost space should: ... 2) ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, <b>fit-out specification</b> , use and size), incorporating existing businesses where possible, <del>or. In exceptional circumstances where this is not feasible, it must be</del> <del>3) demonstrated</del> that suitable alternative accommodation (in terms of type, <b>fit-out specification</b> , use and size) is available in reasonable proximity to the development proposal <del>and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.</del>	London Boroughs, London Councils, Berkeley Group, London Property Alliance	Clarification

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MSC.6.15	E2 C	C Development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area), <b>or a locally determined lower threshold in a local development plan document</b> , should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.	LB Camden, LB Enfield, LB Islington	Clarification
MSC.6.16	E2 Paragraph 6.2.1	<i>Amend text and move to paragraph 6.2.2</i> 6.2.1 Smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. To deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole. <del>Ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.</del>		Clarification

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MSC.6.17	E2 Paragraph 6.2.2	6.2.2 <b>Low-cost business space</b> refers to secondary and tertiary space <b>that is available at open market rents</b> , which is of a lower specification than prime space ...	London Boroughs, London Assembly Planning Committee, London First, Ballymore	Clarification
MSC.6.18	E2 Paragraph 6.2.2	<i>Add amended text from paragraph 6.2.1</i> 6.2.2 ... It usually commands rents at or below the market average. <b>Ensuring a sufficient supply of business space of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents. Part B of Policy E2 supports the life-cycle of prime, secondary and tertiary business space over the longer term by securing the re-provision of capacity (at open market rents).</b>	Ballymore, British Land, British Property Federation, CBI, CBRE Global Investing, Green Party Group, Landsec, L&Q, London First, London Forum of Amenity and Civic Societies, Redrow Homes, Royal London and Silvertown Homes	Clarification
MSC.6.19	E2 Paragraph 6.2.4	<i>Move text to clause E2 B</i> 6.2.4 ... <del>In Part B.2,3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and</del>	LB Bexley, LB Camden, London Councils, Berkeley Group, London Property Alliance	Clarification



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		<del>existing businesses on-site through intensification or reconfiguration.</del> <b>W</b> what constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply...		
MSC.6.20	E2 Paragraph 6.2.4	6.2.4 ... <b>Where appropriate, R</b> relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.		Clarification
MSC.6.21	E2 Paragraph 6.2.6	6.2.6 If business space is demonstrated to be obsolete or surplus to requirements ( <b>see paragraphs 6.1.6A and 6.7.4</b> ), it should be <b>redeveloped for housing and other uses</b> .		Clarification
MSC.6.22	E2 Paragraph 6.2.6	6.2.6... <del>Evidence to assess the reasonable prospect of workspace being used for business purposes should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (for at least 12</del>		Consistency

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		<del>months at market rates suitable for the type, specification, use and size). This evidence should be used to inform viability assessments.</del>		
MSC.6.23	E3 A	A ...Such circumstances include workspace that is: 1) <del>dedicated</del> for specific sectors that have social value such as charities or social enterprises 2) <del>dedicated</del> for specific sectors that have cultural value... 3) <del>dedicated</del> for disadvantaged groups starting up in any sector	Workspace Providers Board	Clarification
MSC.6.24	E3 A 2	A ... Such circumstances include workspace that is:... 2) ...such as <b>creative and</b> artists' <del>studios</del> <b>workspace, rehearsal and performance space</b> and <del>designer</del> -makerspaces	City of London, Theatres Trust	Clarification
MSC.6.25	E3 A 4	A ... Such circumstances include workspace that is:...	Workspace Providers Board	Clarification

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		4) <b>supporting</b> <del>providing</del> educational outcomes through connections to schools, colleges or higher education		
MSC.6.26	E3 A 5	A ... Such circumstances include workspace that is:... 5) supporting start-up <b>and early stage</b> businesses or regeneration.	Workspace Providers Board	Clarification
MSC.6.27	E3 B	B Particular consideration should be given to the need for affordable workspace for the purposes in part A above: 1) where there is existing affordable workspace on-site 2) in areas where cost pressures could lead to the loss of affordable <b>or low-cost</b> workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones) 3) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or	Workspace Providers Board	Clarification

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		cultural uses which contribute to the character of an area.		
MSC.6.28	E3 D	D Affordable workspace policies defined in Development Plans and <b>the terms set out in</b> Section 106 agreements should <b>ensure include ways of monitoring</b> that the objectives in part A above are <b>monitored and achieved being met</b> , including evidence that they <b>space</b> will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact...		Clarification
MSC.6.29	E3 D	D ... Applicants are encouraged to engage with workspace providers at an early stage <b>in the planning process</b> to ensure that the space is configured and managed efficiently.	LB Barnet, LB Brent	Clarification
MSC.6.30	E3 F	F The affordable workspace elements of a mixed-use scheme should be operational, <b>or have agreed finalised terms</b> , prior to residential elements being occupied.	Workspace Providers Board, London Councils, LB Camden, LB Southwark, London First, London Property	Clarification

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			Alliance, Business for London, Canary Wharf Group, Crest Nicholson Plc, Dagenham Dock Ltd, Home Builders Federation, Get London Living, Notting Hill Housing Trust, Taylor Wimpey UK	
MSC.6.31	E3 Paragraph 6.3.1	6.3.1 ...It can be provided <b>and/or managed</b> directly by a <b>dedicated workspace provider, a</b> public, <b>private,</b> charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured permanently by planning or other agreements.	Workspace Providers Board	Clarification
MSC.6.32	E3 Paragraph 6.3.3	6.3.3 As well as ensuring a sufficient supply of affordable business space, the Mayor also wishes to support sectors that have <b>cultural or social value</b> such as artists, <del>'studios,</del> designer-makers, <del>spaces and</del> charities <b>and</b>	Workspace Providers Board	Clarification

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		<del>or</del> social enterprises for which low-cost space can be important...		
MSC.6.33	E3 Paragraph 6.3.3A	<i>Insert new paragraph 6.3.3A</i> <b>6.3.3 A Social, cultural, or economic development objectives can be set in planning obligations, or by ensuring workspace providers are on a Local Authority framework panel or accredited list. Arrangements for engaging a provider, how the space will be owned or leased and the process for review, changes in terms, disposal or termination, should be agreed with the Local Planning Authority. When drawing up local development plan policies, boroughs are encouraged to draw on the experience of local workspace providers to understand the nature of demand in an area.</b>	Workspace Providers Board	Clarification
MSC.6.34	E3 Paragraph 6.3.4	6.3.4 ...He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones (see		Clarification

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		<u>Policy HC5 Supporting London's culture and creative industries</u> ) and promote schemes that provide linked affordable housing and <del>business</del> <b>affordable work</b> space in new housing developments.		
MSC.6.35	E4 A	<i>Add text from E4 A 9)</i> A A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained, <b>taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see <u>Policy E7</u>)...</b>	LB Islington, Port of London Authority, Green Party Group, BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension	Clarification
MSC.6.36	E4 A	A ...This should make provision for <b>the varied operational requirements of:...</b>	LB Islington, Port of London Authority, Green Party Group, BA Pension Trustees, Nationwide Pension Fund Trustee, National Grid UK Pension	Clarification

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MSC.6.37	E4 A 1	1) light and general <b>industry industrial uses (Use Classes B1c and B2)</b>	LB Islington, Port of London Authority, Green Party Group, BA Pension Trustees, Nationwide Pension Fund Trustee, National Grid UK Pension	Clarification
MSC.6.38	E4 A 2	2) storage and logistics/distribution <b>(Use Class B8)</b> including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points	Freight Transport Association	Clarification
MSC.6.39	E4 A 3	3) secondary materials, <del>and</del> waste management <b>and aggregates</b>	Brett Group, East of England Local Government Association, Essex County Council, Freight on Rail, Rail Freight Group, Suffolk County Council, Tarmac	Clarification



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MSC.6.40	E4 A 4	4) utilities infrastructure <b>(such as energy and water)</b>	London Sustainability Exchange, PCS Trade Union	Clarification
MSC.6.41	E4 A 9	<i>Move text to E4 A</i> 9) low-cost industrial and related space for micro, small and medium-sized enterprises (see also <u>Policy E2 Low-cost business space</u> ) <del>taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see <u>Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</u>)</del>	LB Islington, Port of London Authority, Green Party Group, BA Pension Trustees, Nationwide Pension Fund Trustee, National Grid UK Pension	Clarification
MSC.6.42	E4 A 10	10) <b>Research and development of industrial and related products or processes (falling within Use Class B1b).</b>	LB Lambeth, King's College Hospital NHS Foundation Trust	Clarification
MSC.6.43	E4 B 3	B London's land and premises for industry, logistics and services falls into three categories: ...		Clarification

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		3) non-Designated Industrial Sites <sup>78</sup> - see <b>Policy E7 Part D</b> below.		
MSC.6.44	E4 C New Footnote 78A	<p>C The retention, <b>enhancement</b> and provision of <b>additional</b> industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial<sup>78A</sup> floorspace capacity (and operational yard space capacity) within designated SIL and LSIS....</p> <p><i>Insert new footnote 78A</i> <b>78A Defined as the overall range of uses set out in Policy E4 Part A</b></p>	London Industrial and Logistics Sounding Board, London First, London Riverside BID, Federation of Small Businesses, GLA Industrial BIDs Group, Jessica Ferm, Port of London Authority, SEGRO	Clarification
MSC.6.45	E4 C	C ... Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes		Factual update

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		of industrial intensification, co-location and substitution set out in <u>Policy E7 <b>Industrial</b> intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.</u>		
MSC.6.46	E4 D	D The retention, <b>enhancement</b> and provision of additional industrial capacity should be prioritised...	London Industrial and Logistics Sounding Board, Just Space, London Riverside BID, GLA Industrial BIDs Group	Clarification
MSC.6.47	E4 D 4A	<i>Insert new clause 4A</i> D ... in locations that: ... <b>4A) support access to supply chains and local employment in industrial and related activities.</b>	London Industrial and Logistics Sounding Board, Just Space, London Riverside BID, GLA Industrial BIDs Group	Clarification
MSC.6.48	E4 H	H Development proposals for large-scale (greater than 2,500 sqm <del>GEAGIA</del> ) industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs, in particular where there is a local shortage and demand for such space.	LB Bromley	Clarification

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MSC.6.49	E4 Paragraph 6.4.1	6.4.1 ...This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste <b>management including</b> recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology...	Environmental Services Association	Clarification
MSC.6.50	E4 Paragraph 6.4.1 Footnote 79	<i>Amend footnote 79 as follows:</i> <b>SEGRO, Keep London Working, 2017; Turley. Industrial Revolution, 2017</b> <a href="http://www.segro.com/media/keplondonworking?sc_lang=en">http://www.segro.com/media/keplondonworking?sc_lang=en</a> ; <b>Turley. Industrial Revolution, 2017</b> <a href="https://www.turley.co.uk/comment/industrial-revolution">https://www.turley.co.uk/comment/industrial-revolution</a>		Factual update.
MSC.6.51	E4 Paragraph 6.4.4	6.4.4 Over the period 2001 to 2015, more than 1,300 hectares of industrial land (including SILs, LSIS and Non-Designated Industrial Sites) was <b>transferred released to other uses</b> . This was well in excess of previously	Ballymore Group, Rockwell Property Limited	Clarification

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		established London Plan monitoring benchmarks <sup>81</sup> . ...		
MSC.6.52	E4 Paragraph 6.4.5 Footnote 83	6.4.5 ...Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio <sup>83</sup> whichever is the greater).  <i>Amend footnote 83</i>  <b><sup>83</sup> Defined as total proposed industrial floorspace (see Part A), divided by the total proposed site area.</b> Source: London Employment Sites Database, <b>CAG Consulting</b> <del>GLA Economics</del> , 2017: 65 per cent is the default plot ratio assumption for industrial and warehousing sites	Amazon UK Services Limited, Ballymore Group	Clarification
MSC.6.53	E4 Paragraph 6.4.5A	<i>Insert new paragraph 6.4.5A</i> <b>6.4.5A When applying this principle regard should be given to the characteristics and operational requirements of the different industrial uses set out in Part A. Yard space is an essential</b>	Amazon UK Services Limited, LB Barking & Dagenham, LB Bexley, LB Southwark, London Industrial and Logistics Sounding Board,	Clarification

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		<b>requirement for most industrial, logistics and related uses to support servicing, storage and operational needs. Development proposals should ensure that sufficient yard space is provided having regard to the operational requirements of the uses proposed. Mezzanine space should be excluded from calculations of industrial floorspace capacity.</b>	London Riverside BID, British Property Federation, Jessica Ferm, Freight Transport Association, L&Q, SEGRO, Silvertown Homes, UKWA, UPS, Vital OKR	
MSC.6.54	E4 Paragraph 6.4.5B	<i>Insert new paragraph 6.4.5B</i> <b>6.4.5B The principle of no net loss of industrial floorspace capacity applies to overall areas of SIL and LSIS, and not necessarily to individual sites within them.</b> The <b>principle of no net loss</b> of floorspace capacity does not apply to sites <del>previously</del> used for utilities infrastructure or land for transport functions which are no longer required.	LB Harrow, Business for London, Jessica Ferm, SUEZ Recycling and Recovery UK Ltd	Clarification
MSC.6.55	E4 Paragraph 6.4.8	6.4.8 There are three boroughs in the ' <b>Limited Release</b> ' category (all in the Thames Gateway) where industrial land vacancy	GLA Labour Group, LB Newham, Freight	Clarification

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		<p>rates are currently well above the London average. <b>These boroughs are encouraged to intensify industrial floorspace capacity, investigate the reasons for high levels of vacancy, take positive steps to bring vacant sites back into industrial use where there is demand</b> <del>There is scope in these selected boroughs for limited release of industrial land in SIL and/or LSIS through a plan-led approach to reduce these vacancy rates</del> and support the re-use of surplus <b>industrial</b> land and floorspace for other uses <b>through a proactive plan-led approach.</b></p>	Transport Association, Jessica Fern, UPS	
MSC.6.56	E5 A	<p>A Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's <b>largest concentrations</b> <del>main reservoirs</del> of industrial, logistics and related capacity for uses that support the functioning of London's economy.</p>	Just Space, Green Party Group, Vital OKR	Clarification

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MSC.6.57	E5 B 1	<p>B Boroughs, in their Development Plans, should:</p> <p>1) define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution (set out in <u>Policy E7 <b>Industrial</b> intensification, co-location and substitution</u> <del>and use the adopted Local Plan SIL boundary as the basis for decision-making</del>)</p>	RB Greenwich	Clarification
MSC.6.58	E5 B 2	<p>B Boroughs, in their Development Plans, should:</p> <p>2) develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including <del>access</del> improvements <b>to access, public transport, and</b> digital connectivity <b>and other related infrastructure</b>) for the functions set out in part C</p>	Federation of Small Businesses, LB Hounslow, London Forum of Civic and Amenity Societies, London Industrial and Logistics Sounding Board, London Riverside BID, GLA Industrial BIDs Group Olga Astaniotis, UKWA, Watford Borough Council	Clarification



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MSC.6.59	E5 C 4	<p>C Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:</p> <p>4) other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials, <del>and</del> waste management, <b>aggregates</b>, utilities infrastructure, land for transport and wholesale markets</p>	Brett Group, East of England Local Government Association, Essex County Council, Freight on Rail, Rail Freight Group, Suffolk County Council, Tarmac	Clarification
MSC.6.60	E5 C 5A	<p><i>Insert new clause 5A</i></p> <p>C Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:...</p> <p><b>5A) research and development of industrial and related products or processes (falling within Use Class B1b)</b></p>	LB Lambeth, King's College Hospital NHS Foundation Trust	Clarification
MSC.6.61	E5	<i>Update Figure 6.2</i>	LB Bromley	Clarification

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	Figure 6.2			
MSC.6.62	E6 A	A In their Development Plans, boroughs should:  1) <b>Designate and</b> define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution(set out in <u>Policy E7 <b>Industrial</b> intensification, co-location and substitution</u> <del>of land for industry, logistics and services to support London's economic function</del> )	SEGRO, Vital OKR	Clarification
MSC.6.63	E7 Title	Policy E7 <b>Industrial</b> intensification, co-location and substitution <del>of land for industry, logistics and services to support London's economic function</del>		Amendment to make the policy title more concise
MSC.6.64	E7 A 1	A Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8	London Industrial and Logistics Sounding Board, SEGRO	Clarification

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		occupying all categories of industrial land through: 1) <del>development of mezzanines</del>		
MSC.6.65	E7 A 5	A Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through: ... 5) more efficient use of land through higher plot ratios having regard to operational <b>yard space</b> requirements (including servicing) and mitigating impacts on the transport network where necessary.	Amazon UK Services Limited, LB Barking & Dagenham, LB Bexley, LB Southwark, London Industrial and Logistics Sounding Board, London Riverside BID, Jessica Ferm, Freight Transport Association, SEGRO, UKWA, UPS, Vital OKR	Clarification
MSC.6.66	E7 B	B Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified <b>to provide additional industrial capacity</b> . Intensification <del>should</del> <b>can also be used to</b> facilitate the consolidation of <del>the an</del> identified SIL to	London Industrial and Logistics Sounding Board, London First, London Riverside BID, Allies and Morrison, Federation of Small Businesses, GLA Industrial BIDs Group, Jessica Ferm, Port of	Clarification

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		support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal.	London Authority, RB Greenwich, SEGRO	
MSC.6.67	E7 C	C Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified <b>to provide additional industrial capacity</b> and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below...	London Industrial and Logistics Sounding Board, London First, London Riverside BID, Allies and Morrison, Federation of Small Businesses, GLA Industrial BIDs Group, Jessica Ferm, Port of London Authority, Royal Borough of Greenwich, SEGRO	Clarification
MSC.6.68	E7 D 2	D Mixed-use or residential development proposals on Non-Designated Industrial Sites <b>should will</b> be supported where: ... 2) it has been allocated in an <b>adopted local D development P plan document</b> for residential or mixed-use development <del>on</del> <b>the basis of part D.1</b> ; or		Clarification

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MSC.6.69	E7 D 4	D ... be supported where: ... 4) suitable alternative accommodation (in terms of type, <b>fit-out specification</b> , use and size) is available in reasonable proximity to the development proposal...		Clarification
MSC.6.70	E7 E 3	E The processes set out in Parts B, C and D above must ensure that: 3) the intensified industrial, storage and distribution uses are completed <b>and operational</b> in advance of any residential component being occupied	Berkeley Group, Home Builders Federation, Boroughs, London Councils, Ashia Centur Limited, BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension, Provewell Limited, PRP	Clarification
MSC.6.71	E7 E 4 cA	<i>Insert new clause E 4 ca</i> E The processes set out in Parts B, C and D above must ensure that: ... 4) ... with particular consideration given to: ... <b>cA) agent of change principles (see Policy D12 Agent of Change)</b>	LB Haringey, LB Harrow, Aggregate Industries UK Ltd, Cemex UK Ltd, Sainsburys Supermarkets Ltd	Clarification

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MSC.6.72	E7 E 4 e	E The processes set out in Parts B, C and D above must ensure that: ... 4) ... with particular consideration given to: ...  e) air quality, including dust, odour and emissions (see <u>Policy SI1 Improving air quality</u> and <u>Policy SI2 Minimising greenhouse gas emissions</u> ) <b>and potential contamination.</b>	LB Islington	Clarification
MSC.6.73	E7 F	F Development Plans and planning frameworks should consider, in collaboration with <b>the GLA and</b> neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:	LB Ealing, Enterprise M3 Local Enterprise Partnership	Clarification
MSC.6.74	E7 Paragraph 6.7.1	6.7.1 In collaboration with the Mayor, <b>all</b> boroughs are encouraged to explore the potential to <b>intensify industrial activities</b> <sup>85</sup> on industrial land <b>to deliver additional capacity</b> and <b>to</b> consider whether some	London Industrial and Logistics Sounding Board, London First, London Riverside BID, LB Newham,	Clarification

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		types of industrial activities (particularly light industrial) could be co-located or mixed with residential <b>and other uses</b> . ...	Ballymore Group, Allies and Morrison, East of England Local Government Association, Essex County Council, Federation of Small Businesses, GLA Industrial BIDs Group, Jessica Ferm, Port of London Authority, Roca Investments, Rockwell Property Limited, Royal Borough of Greenwich, Royal Borough of Kingston, SEGRO, Vital OKR	
MSC.6.75	E7 Paragraph 6.7.2  New Footnote 86A	6.7.2 Whilst the majority of land in SILs should be retained and intensified for the industrial-type functions set out in part C of <u>Policy E5 Strategic Industrial Locations (SIL)</u> , there may be scope for selected parts of SILs or LSISs to be consolidated. This should be	Ballymore Group, LB Barking & Dagenham	Clarification

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		<p>done through a carefully co-ordinated planned approach (in accordance with parts B, C and E of <u>Policy E7<sup>86A</sup> <del>Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</del></u>) ...</p> <p><i>Insert new footnote 86A</i></p> <p><b>See also paragraphs 6.4.5 to 6.4.5B for the definition of industrial floorspace capacity</b></p>		
MSC.6.76	E7 Paragraph 6.7.2	6.7.2 ... to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the <b>transfer release of some land</b> for a mix of uses including residential.	Ballymore Group, Rockwell Property Limited	Clarification
MSC.6.77	E7 Paragraph 6.7.2	6.7.2 ... Local Plan policies' maps and/or OAPFs <b>and masterplans</b> should indicate clearly: ...	Freight Transport Association, Home Builders Federation, RB Greenwich, Green Party Group, John Lewis Partnership, Just Space, Vital OKR	Clarification



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MSC.6.78	E7 Paragraph 6.7.2	6.7.2 ... (i) the area to be retained and intensified as SIL or LSIS (and to provide future capacity for the uses set out in <u>Policy E5 Strategic Industrial Locations (SIL)</u> and <u>Policy E6 Locally Significant Industrial Sites</u> ) and (ii) the area to be <del>removed</del> <b>released</b> from SIL or LSIS (see illustrative examples in Figure 6.3)...	Ballymore Group, Rockwell Property Limited	Clarification
MSC.6.79	E7 Paragraph 6.7.2	6.7.2 ... ii) the area to be <del>removed</del> <b>released</b> from SIL or LSIS (see illustrative examples in Figure 6.3). <b>Masterplans should cover the whole of the SIL or LSIS, and should be informed by the operational requirements of existing and potential future businesses.</b>	Freight Transport Association, Home Builders Federation, RB Greenwich, Green Party Group, John Lewis Partnership, Just Space, Vital OKR	Clarification
MSC.6.80	E7 Paragraph 6.7.2A	<i>Insert new paragraph 6.7.2A</i> <b>6.7.2A These approaches may be supported by land swaps within the SIL or LSIS, within the borough or in collaboration with neighbouring authorities.</b> To ensure that such development works effectively, there should be a development agreement in place	LB Harrow, LB Newham, London First, London Industrial and Logistics Sounding Board, London Riverside BID, GLA Industrial BIDs Group, Jessica Ferm,	Clarification

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		between <del>a residential and the</del> industrial developer <b>and associated (non-industrial) developers</b> to support this process....	Prologis, SEGRO, Ashia Centur Limited	
MSC.6.81	E7 Paragraph 6.7.2A	<b>6.7.2A</b> ... <del>In order to follow the Fast Track Route (see Policy H4 Meanwhile use), industrial sites will need to meet the 50 per cent threshold for affordable housing.</del>		Clarification
MSC.6.82	E7 Paragraph 6.7.3	6.7.3 Outside of areas designated as SIL or LSIS there may be opportunities to deliver <b>co-location involving a mix of industrial and residential and/or other uses on the same site</b> either side-by-side or through vertical stacking. ...	Allies and Morrison, Ballymore Group, LB Newham, London Industrial and Logistics Sounding Board, London Riverside BID, GLA Industrial BIDs Group, UKWA, Vital OKR	Clarification
MSC.6.83	E7 Paragraph 6.7.4	6.7.4 Evidence to demonstrate ' <b>no reasonable prospect</b> ' <b>of Non-Designated Industrial Sites being used for industrial and related purposes</b> should include:	Federation of Small Businesses, RB Greenwich, Tate and Lyle Sugars	Clarification

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		<ul style="list-style-type: none"> <li>• strategic and local assessments of demand</li> <li>• <b>evidence of vacancy and marketing</b> <del>the site should have been marketed</del> with appropriate lease terms <b>and at market rates suitable for the type, use and size (for at least 12 months, or greater if required by a local development plan document)</b>, and where the premises are derelict or obsolete, offered with the potential for redevelopment to meet the needs of modern industrial users...</li> </ul>		
MSC.6.84	E7 Paragraph 6.7.6	6.7.6 ... This should ensure that the need to maintain sufficient capacity for industry to service London's economy and residents is considered alongside other planning objectives including delivery of strategic infrastructure, housing, social infrastructure and other uses. <b>Further advice on the implementation of Policy E7 will be provided in Supplementary Planning Guidance.</b>		Clarification

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MSC.6.85	E8 D	D Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education <b>providers</b> <del>institutions</del> and other relevant research and innovation organisations should be encouraged.	London Higher, NUS, University of London	Consistency
MSC.6.86	E8 E	E London's higher and further education <b>providers</b> <del>institutions</del> and their development across all parts of London should be promoted. ...	London Higher, NUS, University of London	Consistency
MSC.6.87	E8 GA	<i>Insert new clause GA</i> <b>GA Boroughs are encouraged to identify and support the growth of sustainably-located employment clusters and sectors in inner and outer London.</b>	LB Waltham Forest, London Stansted Cambridge Consortium, London Tenants Federation, Save Swiss Cottage, HFFTRA, Benhill Residents, Earls Court Public Sector Tenants' Association, Individuals	Clarification

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MSC.6.88	E8 Paragraph 6.8.3 Point 2	6.8.3 ... These include: ... <ul style="list-style-type: none"> <li><b>culture and creative industries</b> – building on London’s particular strengths in film, fashion and design, with clusters emerging across the city (including Creative Enterprise Zones – see <u>Policy HC5 Supporting London’s culture and creative industries</u>), and the Mayor’s vision to turn the Thames Estuary into a ‘Production Corridor’, developing facilities for artistic and creative production from East London to Southend <b>and into Kent</b></li> </ul>	Thames Gateway Kent Partnership	Clarification
MSC.6.89	E8 Paragraph 6.8.3 Point 5	6.8.3 ... These include: ... <ul style="list-style-type: none"> <li><b>low carbon and environmental goods and services sector</b> – building on London’s existing strengths in areas such as carbon finance, geothermal, wind energy, building technologies, alternative fuels, photovoltaics and waste management. The Mayor will support businesses to adopt the</li> </ul>	London Waste and Recycling Board	Consistency

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		principles of the circular economy <b>as set out in <u>Policy SI7 Reducing waste and supporting the circular economy.</u></b> <del>reducing waste and improving resource recovery and reuse</del> The Mayor will also support the growth of London's CleanTech sector across London. ...		
MSC.6.90	E8 Paragraph 6.8.3 Point 5	6.8.3 ... These include: ... <ul style="list-style-type: none"> <li>... with the development of a major innovation campus by Imperial College <b>London</b> at White City, and the simultaneous redevelopment of Old Oak and Park Royal into a smart and sustainable district</li> </ul>	Imperial College London	Factual update
MSC.6.91	E8 Paragraph 6.8.4	6.8.4 The Mayor also supports measures to secure and develop <b>London's leading role as a centre of higher and further education</b> of national and international importance. London's higher and further education <del>providers institutions</del> have considerable potential for innovation supported by collaboration between businesses, the public sector and other	London Higher, NUS, University of London	Consistency

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		relevant research organisations. These initiatives can act as a catalyst for economic growth and promote social mobility in areas with high levels of deprivation by creating new jobs and training opportunities for local residents, as well as supporting the growth of emerging sectors in London. The Mayor will support higher and further education <b>providers</b> <del>institutions</del> and boroughs to identify opportunities to work in partnership to benefit from the development of higher and further education facilities.		
MSC.6.92	E8 Paragraph 6.8.6A	<i>Insert new paragraph 6.8.6A</i> <b>6.8.6A Boroughs across London contain a rich variety of employment areas, including industrial estates, high streets and areas within and on the edge of town centres, which provide locations and opportunities for locally significant sectors and clusters of businesses. These are important for local economies and provide diverse employment opportunities for local residents. Boroughs are encouraged to</b>	LB Waltham Forest, London Stansted Cambridge Consortium, London Tenants Federation, Save Swiss Cottage, HFFTRA, Benhill Residents, Earls Court Public Sector Tenants' Association, Individuals	Clarification

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		<b>identify these sectors and clusters and set out policies in Local Plans that support their growth in sustainable ways, having regard in particular to public transport provision and ensuring the vitality and viability of town centres.</b>		
MSC.6.93	E9 BA	<i>Insert new clause BA</i> <b>BA Development plans and development proposals should:</b>	Community groups, Just Space, Federation of Small Businesses, TUC, London Food Link, individuals	Clarification
MSC.6.94	E9 BA 7	<b>BA Development plans and planning proposals should:</b>  7 support <del>the range of</del> London's markets <b>in their full variety</b> , including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to <b>local identity and</b> the vitality of town centres and the Central Activities Zone	Community groups, Just Space, Federation of Small Businesses, TUC, London Food Link, Individuals	Clarification



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MSC.6.95	E9 C	C Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance <b>from the entrances and exits</b> of an existing or proposed primary or secondary school. ...	LB Barnet	Clarification
MSC.6.96	E9 C	C ... Boroughs should also <del>consider whether it is appropriate to carefully</del> manage <b>an-the</b> over-concentration of A5 hot food takeaway uses within <del>Local, District and other</del> town centres <b>and other areas</b> through the use of locally-defined thresholds in Development Plans.	Office of London CCGs PHE London	Consistency
MSC.6.97	E9 Paragraph 6.9.1	6.9.1 A diverse and competitive retail sector that meets the needs of Londoners and visitors to the capital is important. <b>Retailing is undergoing a period of continued restructuring</b> in response to recent trends and future forecasts for consumer expenditure, population growth, technological advances and changes in consumer behaviour, with increasing	London Forum of Amenity and Civic Societies	Clarification

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		proportions of spending made via the internet.		
MSC.6.98	E9 Paragraph 6.9.3	6.9.3 ... Boroughs should plan proactively to accommodate that demand and <b>manage the transition of surplus retail</b> (including high street frontages, purpose-built shopping centres, malls and retail parks) to other uses in line with this <b>policy</b> and <u>Policy SD6 Town centres <b>and high streets</b>, Policy <del>SD7-8</del> Town centre network, Policy <del>SD8-7</del> Town centres: development principles and Development Plan Documents, <b>while ensuring sufficient capacity for convenience retail to meet the day-to-day needs of local residents</b> and <del>Policy E9 Retail, markets and hot food takeaways</del>.</u>	LB Islington	Clarification
MSC.6.99	E9 Paragraph 6.9.4	6.9.4 ...extend choice and access to a range of goods, contribute to the vitality and viability of town centres <b>and the character of high streets</b> , and provide opportunities for new businesses to start-up. Several markets are of strategic importance, such as those at Portobello Road, Borough, Columbia Road	Community groups, Just Space, Federation of Small Businesses, TUC, London Food Link, individuals	Clarification and consistency

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		and Camden for example, and offer significant attractions for Londoners and visitors to the capital. <b>Many markets have a specialist function, serving the shopping and leisure needs of a specific ethnic group, or providing speciality products and services.</b> Whilst the planning system can help support the range of London's markets, broader actions are often required in terms of management and investment. The Mayor has established the London Markets Board to help ensure that markets continue to flourish, support growth in town centres and associated high streets, and remain vibrant attractions for all Londoners and visitors to the capital.		
MSC.6.100	E9 Paragraph 6.9.4 Footnote 91	<i>Amend footnote 91 as follows:</i> GLA Street Markets research – Understanding London's Markets, <b>GLA 2017.</b>		Factual update
MSC.6.101	E9 Paragraph 6.9.5	6.9.5 ...The proliferation and concentration of these uses should be carefully managed through Development Plans <b>and planning decisions</b> , particularly in town centres that		Consistency

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		are within Strategic Areas for Regeneration (see Table A1.1), which tend to have higher numbers of these premises <sup>92</sup> . ...		
MSC.6.102	E9 Paragraph 6.9.5 and Footnote 92	6.9.5 ... that are within Strategic Areas for Regeneration (see Table A1.1), which tend to have higher numbers of these premises <sup>92</sup> . <b>Boroughs may require Health Impact Assessments for particular uses.</b>  <i>Amend footnote 92 as follows:</i> <sup>92</sup> London Town Centre Health Check, GLA <del>2017</del> <b>2018</b> .	LB Camden, LB Islington	Clarification
MSC.6.103	E9 Footnote 93	<sup>93</sup> From Evidence into Action: Opportunities to Protect and Improve the Nation's Health. Public Health England, Oct. 2014. <del><a href="https://www.gov.uk/government/publications/from-evidence-into-action-opportunities-to-protect-and-improve-the-nations-health">https://www.gov.uk/government/publications/from-evidence-into-action-opportunities-to-protect-and-improve-the-nations-health</a></del>  <del><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366852/PHE_Priorities.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366852/PHE_Priorities.pdf</a></del>		Factual Update

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MSC.6.104	E9 Footnote 94	<sup>94</sup> <del>Public Health England (2016) Fast Food Map</del> <del><a href="https://www.noo.org.uk/securefiles/161024_1252/FastFoodmap_FINAL.pdf">https://www.noo.org.uk/securefiles/161024_1252/FastFoodmap_FINAL.pdf</a></del> <b>Fast Food Map. Public Health England, 2016</b> <del><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578041/Fast_food_map_2016.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578041/Fast food map_2016.pdf</a></del>		Factual Update
MSC.6.105	E9 Paragraph 6.9.7	6.9.7 ... <b>Boroughs wishing to set a locally-determined boundary from schools should justify this using evidence provided by public health leads.</b> Shift and night-time workers also find it particularly difficult to access healthy food due to the limited options available to them at night time.	TCPA	Clarification
MSC.6.106	E9 Footnote 95	<sup>1</sup> <del><a href="http://www.cieh.org/healthier-catering-commitment.html">http://www.cieh.org/healthier-catering-commitment.html</a></del> <b>The Healthier Catering Commitment</b> <del><a href="https://www.london.gov.uk/what-we-do/business-and-economy/food/our-projects-food-london/healthier-catering-commitment">https://www.london.gov.uk/what-we-do/business-and-economy/food/our-projects-food-london/healthier-catering-commitment</a></del>		Factual Update

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MSC.6.107	E10 B	B The special characteristics of major clusters of visitor attractions and <b>heritage assets</b> <b>and</b> the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.	Historic England	Clarification
MSC.6.108	E10 C & CA	<i>E10 C divided into clauses C and CA</i>		
MSC.6.109	E10 C	C A sufficient supply <b>and range</b> of serviced accommodation <del>for business visitors</del> should be maintained.	RB Kingston, LB Islington	Clarification
MSC.6.110	E10 CA	<i>Insert new clause CA</i> <b>CA</b> <del>and</del> <del>T</del> The provision of high-quality convention facilities in town centres and in and around the CAZ should be supported.		Clarification
MSC.6.111	E10 CB	<i>Insert new clause CB</i> <b>CB Camping and caravan sites should be supported in appropriate locations.</b>		Clarification
MSC.6.112	E10 D	D Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in <del>the commercial core</del> <b>other</b> parts of the CAZ <b>except wholly</b>		Consistency

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		<b>residential streets or predominantly residential neighbourhoods</b> (see <u>Policy SD5 Offices, other strategic functions and residential development in the CAZ</u> ), ...		
MSC.6.113	E10 D	D ... <b>and</b> subject to the impact on <b>strategic</b> office space <b>and other strategic functions</b> . ...	Westminster City Council	Clarification
MSC.6.114	E10 D	D ... Intensification of the provision of serviced accommodation in areas of <b>existing</b> concentration should be resisted, <del>except</del> where this <del>will not</del> compromises local amenity or the balance of local land uses.	LB Islington	Clarification and readability
MSC.6.115	E10 F	F The role of apart-hotels and short-term lettings should be supported whilst ensuring that they do not compromise housing provision (see <u>Policy H11 Ensuring the best use of stock</u> ). <b>Through development plan policies, boroughs may address impacts on local amenity caused by short-term lettings.</b>	LB Newham, Marble Arch Partnership	Clarification

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MSC.6.116	E10 G 1	G To ensure sufficient choice for people who require an accessible bedroom..... 1) 10 per cent of new bedrooms to be wheelchair-accessible <b>in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice;</b> OR	Just Space, LB Tower Hamlets, LB Camden, ARUP, The Access Association	Factual update
MSC.6.117	E10 G 2	G To ensure sufficient choice for people who require an accessible bedroom... 2) 15 per cent of new bedrooms to be accessible rooms <b>in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice .following requirements:</b> <del>a) one room or five per cent, whichever is the greater, with a wheelchair-accessible shower room for independent use</del> <del>b) a further one room or one per cent, whichever is the greater, with a fixed</del>	Just Space, LB Tower Hamlets, LB Camden, ARUP, The Access Association	Factual update



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		<p><del>tracked-hoist-system-or-similar-system with the same degree of convenience and safety as an en-suite bathroom for assisted use, and a connecting door to an adjoining (standard) bedroom for use by an assistant or companion</del></p> <p><del>e) one room or five per cent, whichever is the greater with an en-suite shower room to meet the requirements of ambulant disabled people</del></p> <p><del>d) four per cent of bedrooms easily adaptable and large enough for easy adaptation to be wheelchair-accessible (with en-suite) if required in the future, and incorporate all the correct dimensions and sanitary layouts and be structurally capable of having grab-rails installed quickly and easily if required.</del></p>		
MSC.6.118	E10 Paragraph 6.10.1	6.10.1 ... complemented by supporting infrastructure including visitor accommodation, <b>a</b> high-quality public realm, public toilets and measures to promote		

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		access by walking, cycling and public transport.		
MSC.6.119	E10 Paragraph 6.10.2	6.10.2 ... It is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum. <b>In addition to leisure visitors, the needs of business visitors require consideration, including provision of suitable facilities for meetings, conferences and exhibitions in both hotels and purpose-built convention and exhibition centres.</b>	LB Islington	Clarification
MSC.6.120	E10 Paragraph 6.10.3	6.10.3 <b>Boroughs in the CAZ</b> are encouraged to direct strategically-significant serviced accommodation (defined as more than 20,000 sqm in the CAZ) towards the CAZ Opportunity Areas <del>with smaller-scale provision in other commercial core areas of the CAZ.</del> ...		Consistency
MSC.6.121	E10 Paragraph 6.10.4	6.10.4 ...that the impact such provision can have on <del>traditionally</del> residential areas is addressed. <b>In local Development Plan</b>	LB Newham, Marble Arch Partnership	Clarification

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		<b>Documents, boroughs may seek to address issues such as over-concentration and servicing of short-term lets, to protect local amenity. ...</b>		
MSC.6.122	E10 Paragraph 6.10.4	6.10.4 ... residential areas is addressed. <b>In local Development Plan Documents, boroughs may seek to address issues such as over-concentration and servicing of short-term lets, to protect local amenity. ...</b>	LB Newham, Marble Arch Partnership	Clarification
MSC.6.123	E10 Paragraph 6.10.4	6.10.4 ...The use of student halls as visitor accommodation during university vacation periods can help meet seasonal fluctuations in demand. <b>The scale and nature of the use will determine whether planning permission is required. ...</b>	LB Islington	Clarification
MSC.6.124	E11 A	A The Mayor will work with strategic partners to address low pay and <b>gender and ethnicity pay gaps</b> , ...	SEGRO, GLA Labour Group	Clarification

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MSC.6.125	E11 A	A ... <b>and as set out in his Skills for Londoners Strategy supported by his Skills for Londoners Taskforce</b> , co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.	Cross River Partnership	Factual update
MSC.6.126	E11 B	<i>E11 B divided into B1, B2 and B3</i>		Readability
MSC.6.127	E11 B	B Development proposals should <del>seek to</del> support employment...	TUC London, South East and East of England	Clarification
MSC.6.128	E11 B	B ... Boroughs should ensure these are implemented in ways that: <del>(a1)</del> enable <b>trainees people undertaking training</b> to complete their training and apprenticeships; <del>(b2)</del> ensure the greatest level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created, and	LB Newham	Clarification

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		<p><del>e 3</del>) increase the proportion of under-represented groups within the construction industry workforce.</p> <p>In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.</p>		
<b>Chapter 7 Heritage and Culture</b>				
MSC.7.1	HC1 A	<p>A This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, <b>and interpretation of</b>, the heritage assets, landscapes and archaeology within their area.</p>	City of London Corporation	Clarification
MSC.7.2	HC1 B 4	<p>B ...This knowledge should be used to inform the effective integration of London's heritage in regenerative change by: ...</p>	London Forum of Amenity and Civic Societies	Clarification

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		4) delivering positive benefits that <del>sustain</del> <b>conserve</b> and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.		
MSC.7.3	HC1 C	C ...Development proposals should <del>seek to</del> avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.	Historic England, LB Enfield, LB Hillingdon	Clarification
MSC.7.4	HC1 Paragraph 7.1.1	7.1.1...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. <b>The Mayor will develop a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth.</b>	Historic England	Clarification

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MSC.7.5	HC1 Paragraph 7.1.2	7.1.2 ...Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows, <del>and</del> ancient woodlands, <b>and aged or veteran trees</b> . ...	Natural England	Clarification
MSC.7.6	HC1 Paragraph 7.1.2	7.1.2 ... The distribution of designated assets differs across different parts of London, and is shown in Figure 7.1, Figure 7.2, Figure 7.3, <del>Figure 7.4</del> and Figure 7.5. Note that these maps are for illustrative purposes only.		Clarification
MSC.7.7	HC1 Figure 7.1	Update key		Clarification
MSC.7.8	HC1 Paragraph 7.1.3	7.1.3 Ensuring the <b>identification and sensitive management of London's heritage assets</b> in tandem with promotion of the highest standards of <del>modern</del> architecture ...	Historic England, LB Islington	Clarification
MSC.7.9	HC1 Paragraph 7.1.3	7.1.3 ... will be essential to maintaining the blend of old and new that <del>gives-contributes</del> <b>to</b> the capital's <del>its</del> unique character. ...		Clarification

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MSC.7.10	HC1 Paragraph 7.1.4	7.1.4 ...London containing over 196,000 entries. In addition to utilising this record, boroughs' <b>existing evidence bases, including</b> character appraisals, conservation plans and local lists should be used as a reference point for plan-making and when informing development proposals.	London Boroughs	Clarification
MSC.7.11	HC1 Paragraph 7.1.5	7.1.5 ...Development Plans and strategies should demonstrate a clear understanding of the heritage values of a <b>building, site, or</b> area and its relationship with its surroundings.	London Forum of Amenity and Civic Societies, individual	Clarification
MSC.7.12	HC1 Paragraph 7.1.5	7.1.5 ...stakeholders should include Historic England, boroughs, heritage specialists, as well as local communities <b>and amenity societies.</b>	Historic England, Brixton Society, Camden Town CAAC	Clarification
MSC.7.13	HC1 Paragraph 7.1.6	7.1.6 ... it will be expressed by retaining and reusing buildings, spaces and features that play an important role in the local character of an area. <b>Policy D2 Delivering good design further addresses the issue of understanding character and context.</b> <del>Figure 7.4 illustrates the broad</del>		Relocated for clarity



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		<del>characteristics of London as derived from its historical development, which can be used to inform evidence bases for area-based strategies.</del>		
MSC.7.14	HC1 Paragraph 7.1.7	<p><b>7.1.7 Heritage significance is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may <del>can</del> be represented in many ways, in an asset's visual attributes, such as - form, <del>scale</del>, materials, <del>and</del> architectural detail, design and setting, as well as through historic associations between people and a place, and, where relevant, the historic relationships between heritage assets. Development that affects <del>the settings of</del> heritage assets <b>and their settings</b> should respond positively to the assets' significance, local context and character, <b>and to</b> protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to <b>mitigating</b> impacts from</b></p>	Historic England, Blackheath Society	Clarification

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		development that is not sympathetic in terms of scale, materials, details and form.		
MSC.7.15	HC1 Figure 7.4	<i>Move Figure 7.4 from HC1 to D2</i> <del>Figure 7.4 – Outline Character Map of London</del>		Relocated for clarity
MSC.7.16	HC2 Paragraph 7.2.1	7.2.1 ...In ratifying the World Heritage Convention, the UK Government has made a commitment to <b>protecting, conserving, presenting and transmitting to future generations the Outstanding Universal Value of and enhancing World Heritage Sites' and to protecting and conserving Outstanding Universal Value and their settings. Much of this commitment</b> <del>This duty is discharged by transferred to</del> local authorities, <b>including the GLA, through their effective implementation of national, regional, and local planning policies for conserving and enhancing the historic environment.</b>	Historic England, Westminster City Council	Clarification
MSC.7.17	HC2 Paragraph 7.2.3	7.2.3 The <b>setting of London's World Heritage Sites</b> consists of the surroundings in which they are experienced, and is recognised as fundamentally contributing to the	West London River, Groups, Individuals, Historic England	Clarification

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		appreciation of a World Heritage Site's Outstanding Universal Value. <b>As all four of London's World Heritage Sites are located along the River Thames, the setting of these sites includes the adjacent riverscape as well as the surrounding landscape. ...</b>		
MSC.7.18	HC2 Paragraph 7.2.3	7.2.3 ...Changes to the setting can have <del>either</del> an adverse, <b>neutral</b> or beneficial impact on the ability to appreciate the sites's Outstanding Universal Value...		Clarification
MSC.7.19	HC2 Paragraph 7.2.4	7.2.4 Policies protecting the Outstanding Universal Value of World Heritage Sites (WHS) should be included in the Local Plans of those boroughs where visual impacts from developments could occur. It is expected that <del>the following</del> boroughs' <b>plans (including but not limited to the following)</b> should contain such policies: ...	Westminster City Council, LB Bexley	Clarification
MSC.7.20	HC2 Paragraph 7.2.4	7.2.4 ... City of London (Tower of London WHS); Royal Borough of Greenwich (Maritime Greenwich WHS); Hounslow (Royal Botanical Gardens Kew WHS);	Maritime Greenwich World Heritage Site, London Forum of	Factual update

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		Lambeth (Westminster WHS); <b>Lewisham (Maritime Greenwich WHS)</b> ; Richmond (Royal Botanical Gardens Kew WHS); Southwark (Tower of London WHS, Westminster WHS); Tower Hamlets ( <del>The</del> Tower <b>of London</b> WHS, Maritime Greenwich WHS);	Amenity and Civic Societies	
MSC.7.21	HC3 A	A Strategic Views include significant buildings, <del>or</del> urban landscapes <b>or riverscapes</b> that help to define London at a strategic level. ...	Community Food Growers Network, The Northbank BID	Clarification
MSC.7.22	HC3 Paragraph 7.3.1	7.3.1 ...development is likely to compromise the setting or visibility of a key landmark and should be resisted. <b>The views that the Mayor has designated are listed in Table 7.1, with Figure 7.6-Figure 7.5 showing the indicative viewing locations of these designated views.</b>		Clarification
MSC.7.23	HC3 Paragraph 7.3.5	7.3.5 The Mayor will work with <b>boroughs and</b> landowners of the Protected Vista <b>viewing locations</b> to ensure the viewing points are clearly identified. ...	Westminster City Council	Clarification

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MSC.7.24	HC3 Paragraph 7.3.6	7.3.6 Clearly identifying <b>important local views</b> in Local Plans and strategies enables the effective management of development in and around the views. <b>Where this has been done, these I</b> Local views should be given the same degree of protection as Strategic Views.	National Trust London, RB Kensington and Chelsea, The Putney Society	Clarification
MSC.7.25	HC3 Figure 7.6	Figure <del>7.6</del> <b>7.5</b> – Designated Strategic Views		Consistency
MSC.7.26	HC4 A	A ...They should also preserve <del>or</del> <b>and where possible</b> enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks...	City of London Corporation	Clarification
MSC.7.27	HC4 B	B Development in the foreground, <del>and</del> middle ground <b>and background</b> of a designated view should not be <del>overly</del> intrusive, unsightly or prominent to the detriment of the view.	Historic England, City of London Corporation, London Forum of Amenity and Civic Societies	Clarification
MSC.7.28	HC4 Paragraph 7.4.1A	<i>Insert new paragraph 7.4.1A</i> <b>7.4.1A Development should make a positive contribution and where</b>	Historic England	Clarification

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		<b>possible enhance the viewer's ability to recognise Strategically-Important Landmarks. Where existing buildings currently detract from or block the view, this should not be used as justification for new development to likewise exceed the threshold height of the Landmark Viewing Corridor.</b>		
MSC.7.29	HC4 Paragraph 7.4.1B	<i>Insert new paragraph 7.4.1B</i> <b>7.4.1B Opportunities to reinstate Landmark Viewing Corridors arising as a result of redevelopment and demolition of existing buildings that exceed Landmark Viewing Corridor threshold height should be taken whenever possible.</b>		
MSC.7.30	HC5 C 4	C Where a Creative Enterprise Zone has been identified, Local Plan policies should: ... 4) encourage the temporary use of vacant buildings <b>(including heritage assets)</b> and sites for creative workspace and activities	Historic England	Clarification

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MSC.7.31	HC5 C 5	C Where a Creative Enterprise Zone has been identified, Local Plan policies should: ... 5) integrate public transport, digital and other infrastructure, and services <del>provision</del> such as...	LB Islington	Clarification
MSC.7.32	HC5 C 5	C Where a Creative Enterprise Zone has been identified, Local Plan policies should: ... 5) ...leisure, recreation, <b>education</b> and community facilities in the establishment and development of the Creative Enterprise Zone	GLA Labour Group	Clarification
MSC.7.33	HC5 Paragraph 7.5.1	7.5.1 London's rich cultural offer includes visual and performing arts, music, spectator sports, festivals and carnivals, pop-ups and street markets, and a diverse and innovative food scene, which is important for London's cultural tourism. <b>The vibrancy of London's culture is integrally linked to the diverse communities of the city, and grassroots venues and community projects are as important as London's famous cultural institutions in providing opportunities</b>	Just Space	Clarification

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		<b>for all Londoners to experience and get involved in culture.</b>		
MSC.7.34	HC5 Paragraph 7.5.1A	<p><i>Insert new paragraph 7.5.1A</i></p> <p><b>7.5.1A</b> The capital's cultural offer is often informed, supported and influenced by the work of the creative industries such as advertising, architecture, design, fashion, publishing, television, video games, radio and film. Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, <del>and</del> <b>music, spectator sports,</b> and other entertainment <b>or performance</b> venues, including pubs and night clubs. Although primarily serving other functions, the public realm, <b>community facilities, places of worship,</b> parks, <b>and</b> skate-parks <del>and sports venues</del> can provide important settings for a wide range of arts and cultural activities.</p>	Community groups, Just Space, The Selby Trust, Stonewall Housing, London Forum of Amenity and Civic Societies	Clarification
MSC.7.35	HC5 Paragraph 7.5.3	7.5.3 Despite this positive general picture, London's competitive land market means	LB Islington	Clarification



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		that the industry is struggling to find sufficient venues to grow and thrive, and is <b>losing essential spaces and venues</b> for cultural production and consumption including pubs, <b>night-clubs, and music venues hosting live or electronic music and rehearsal spaces.</b>		
MSC.7.36	HC5 Paragraph 7.5.4	7.5.4 Boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, <b>evaluate what is unique or important to residents, workers and visitors</b> and develop policies to protect those cultural assets <b>and community spaces.</b> ...	Just space, community groups	Clarification
MSC.7.37	HC5 Paragraph 7.5.5	7.5.5 The loss of cultural venues, facilities or spaces can have a detrimental effect on an area, particularly when they serve a local community function. Where possible, boroughs should protect such cultural facilities and uses, <b>and support alternative cultural uses</b> , particularly those with an evening or night-time use, and <del>support</del>	LB Camden  Housing developers, LB Islington	Clarification

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		<b>consider</b> nominations to designate them as <b>Assets of Community Value</b> . ...		
MSC.7.38	HC5 Paragraph 7.5.6	7.5.6 Boroughs are <del>also</del> encouraged to support opportunities to use vacant buildings and land for flexible and temporary ' <b>meanwhile uses</b> ' or ' <b>pop-ups</b> ' especially for alternative cultural day and night-time uses. ...		Readability
MSC.7.39	HC5 Paragraph 7.6.7	7.6.7 ...The opportunity to incorporate these uses should be identified and facilitated through careful design <b>and consideration of the impacts, for example on residents, visitors and biodiversity.</b>	London Forum of Amenity and Civic Societies, LB Islington	Clarification
MSC.7.40	HC5 Paragraph 7.5.12	7.5.12 ... CEZs will support the provision of dedicated small industrial and creative workspaces and will seek to address issues of affordability and suitability of <b>workspaces</b> for artists and creative businesses.		Consistency
MSC.7.41	HC5 Paragraph 7.5.13	7.5.13 ...and encouraging the temporary use of vacant buildings for creative uses. <b>In developing policies and strategies for CEZs, boroughs should engage with</b>	GLA Green Party Group	Clarification

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		<b>local CEZ Consortiums, communities and businesses.</b>		
MSC.7.42	HC6 A New footnote 99A	A ...building on the Mayor's Vision for London as a 24-Hour City <sup>99A</sup> .  <i>Insert new footnote 99A</i>  <b><a href="https://www.london.gov.uk/what-we-do/arts-and-culture/arts-and-culture-publications/londons-first-ever-24-hour-vision">https://www.london.gov.uk/what-we-do/arts-and-culture/arts-and-culture-publications/londons-first-ever-24-hour-vision</a></b>	City of London Corporation	Clarification
MSC.7.43	HC6 B 2	B In Development Plans, town centre strategies and planning decisions, boroughs should: ...  2) improve <b>inclusive</b> access, <b>inclusion</b> and safety, and make the public realm welcoming for all night-time economy users and workers	London Assembly Planning Committee	Clarification
MSC.7.44	HC6 B 4	B In Development Plans, town centre strategies and planning decisions, boroughs should: ...  4) address the cumulative impact of high concentrations of licensed premises <b>and</b>	LB Islington	Clarification and readability

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		<del>their impact</del> on anti-social behaviour, noise pollution, health and wellbeing and other <del>impacts issues</del> for residents <b>and nearby uses</b> , and seek ways to diversify and manage these areas		
MSC.7.45	HC6 Paragraph 7.6.1	7.6.1 The <b>night-time economy</b> refers to all economic activity taking place between the hours of 6pm and 6am, <b>and includes evening uses</b> .	City of Westminster, business groups, Soho Society, Theatres Trust	Clarification
MSC.7.46	HC6 Paragraph 7.6.2	7.6.2 ...However, 24-hour activities are not suitable for every part of London <del>and its residents</del> , and boroughs should balance the needs of local residents <b>in all parts of London</b> with the economic benefits of promoting a night-time economy.	LB Camden	Clarification and readability
MSC.7.47	HC6 Paragraph 7.6.4	7.6.4 Each <b>night-time economy</b> area will have its own character, which should be recognised and supported in order to maintain the <b>rich diversity of London's night-time economy</b> . ...	City of London Corporation	Clarification
MSC.7.48	HC6 Paragraph 7.6.6	7.6.6 There are many benefits to promoting night-time economic activity such as	LB Camden	Clarification and readability

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		generating jobs, improving income from leisure and tourism, <b>and providing opportunities for social interaction, and</b> making town centres safer by increasing activity and <del>providing</del> passive surveillance. ...		
MSC.7.49	HC6 Paragraph 7.6.6	7.6.6 ...Managing issues such as transport, <b>servicing</b> , increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment.....	SEGRO	Clarification
MSC.7.50	HC6 Paragraph 7.6.6	7.6.6 ... Boroughs are encouraged to consider appropriate <b>management strategies and mitigation measures</b> to reduce negative impacts on the quality of life of local residents, workers and night-time economy customers, <b>particularly in areas with high concentrations of licensed premises.</b> ...	Residents' Association, Boroughs	Clarification
MSC.7.51	HC6 Paragraph 7.6.6 New Footnote 99B	7.6.6 ... <b>Boroughs should consider applying for accreditation with schemes such as Purple Flag<sup>99B</sup> which provide a standard of excellence in managing the night-time economy.</b>	London Forum of Amenity and Civic Societies	Clarification

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		<i>Insert new footnote 99B</i> <a href="https://www.atcm.org/purple-flag">https://www.atcm.org/purple-flag</a>		
MSC.7.52	HC6 Paragraph 7.6.7	7.6.7 ...to include extending opening hours and alternative evening and night-time uses of existing daytime facilities such as shops, cafés, <b>restaurants, markets, community centres</b> , libraries theatres and museums. ...	Community Food Growers' Network	Clarification
MSC.7.53	HC6 Paragraph 7.6.9	7.6.9 ...This can help attract a <del>wider</del> <b>more diverse</b> range of visitors, including those who feel excluded from alcohol-based entertainment activities. ...	Community Food Growers' Network	Readability
MSC.7.54	HC6 Paragraph 7.6.10	7.6.10 ...This requires careful and co-ordinated management between a wide variety of stakeholders, <b>including residents</b> , <del>in order</del> to ensure that the city can be enjoyed at night to its fullest, and that the night-time economy complements rather than conflicts with daytime activities. ...	Community Food Growers' Network	Clarification and readability
MSC.7.55	HC6 Paragraph 7.6.10	7.6.10 ... <b>Impacts such as noise and light pollution on local wildlife and biodiversity should be considered</b>	London Wildlife Trust, Natural England, CPRE, individual	Clarification

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		<b>through appropriate location, design and scheduling.</b>		
MSC.7.56	HC6 Paragraph 7.6.11	<p><i>Re-order text within paragraph 7.6.11</i></p> <p>7.6.11 <b>Making London's night-time culture more enjoyable and inclusive requires ensuring a wide range of evening and night-time activities are on offer to London's diverse population. In recent years, many valued night-time venues have been lost, and this has disproportionately affected particular groups.</b> There are <b>also</b> groups of people who avoid town centres and night-time activities for a variety of reasons, for example physical barriers and lack of facilities for disabled people and older people, perceptions around safety and security particularly for women, those who feel excluded for socio-economic reasons and issues of staff attitudes towards, and awareness of, LGBT+ and BAME groups. <del>Making London's night-time culture more enjoyable and inclusive requires ensuring a wide range of evening and</del></p>	Community Food Growers Network, Just Space	Clarification

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		<del>night-time activities are on offer to London's diverse population...</del>		
MSC.7.57	HC6 Paragraph 7.6.11	7.6.11 ...Boroughs should <b>also</b> work with land owners, investors and businesses to address perceived barriers to accessing the night-time economy and enhance the experience of London at night.		Readability
MSC.7.58	HC6 Paragraph 7.6.11	7.6.11 ...This can include requiring new developments to provide accessible <b>and gender-neutral</b> toilets (see <u>Policy S6 Public toilets</u> ),...	The Putney Society	Clarification
MSC.7.59	HC6 Paragraph 7.6.11 New Footnote 99C	7.6.11 ... <b>supporting venues that serve specific groups (for example through the LGBT+ Venues Charter<sup>99C</sup>)</b> ... <i>Insert new footnote 99C</i> <b><a href="https://www.london.gov.uk/what-we-do/arts-and-culture/how-we-protecting-lgbt-nightlife-venues">https://www.london.gov.uk/what-we-do/arts-and-culture/how-we-protecting-lgbt-nightlife-venues</a></b>	UCL Urban Laboratory	Clarification
MSC.7.60	HC6 Paragraph 7.6.11	7.6.11 ...and working with local businesses, <b>local communities</b> , TfL and logistics operators to optimise servicing that occurs at night or supports the night-time economy.	Community Food Growers' Network	Clarification



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MSC.7.61	HC6 Figure 7.7	<i>Amend Figure 7.7 to align with changes to Table A1.1 in Annex One</i>		Consistency
MSC.7.62	HC7 A 1	A Boroughs should: 1) protect public houses where they have a heritage, economic, social or cultural value to local communities, <del>and</del> <b>or</b> where they contribute to wider policy objectives for town centres, night-time economy areas, <b>Cultural Quarters</b> and Creative Enterprise Zones		Clarification
MSC.7.63	HC7 A 2	A Boroughs should: ... 2) support proposals for new public houses <b>where they would</b> <del>to</del> stimulate town centres <del>regeneration</del> , <del>C</del> cultural <del>Q</del> quarters, the night-time economy and mixed-use development, <b>taking into account potential negative impacts where appropriate.</b>	Westminster City Council, Alliance for Childhood	Clarification and consistency
MSC.7.64	HC7 Paragraph 7.7.2	7.7.2 Through their unique and varied roles, pubs can contribute to the regeneration of town centres, Cultural Quarters and local tourism, as well as providing a focus for	Just space, community groups	Clarification

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		existing and new communities, and meeting the needs of particular groups, such as the LGBT+ <del>community</del> <b>communities</b> . ...		
MSC.7.65	HC7 Paragraph 7.7.3	7.7.3 Many pubs are popular because they have intrinsic character. This is often derived from their architecture, <b>interior and exterior fittings</b> , their long-standing use as a public house, their history, <b>especially</b> as a place of socialising and entertainment catering for particular groups...	Historic England, London Forum of Amenity and Civic Societies	Clarification
MSC.7.66	HC7 Paragraph 7.7.4	7.7.4 ...and any potential negative impacts. <b>Boroughs should consider the replacement of existing pubs in redevelopment and regeneration schemes, particularly where their loss would have an impact on the local or wider community.</b>	GLA Labour Group, LB Barnet	Clarification
MSC.7.67	HC7 Paragraph 7.7.5	7.7.5 ...An ACV listing does, nevertheless, give communities an increased chance to save a valued pub or other local facility. <b>Boroughs should consider the listing of a pub as an ACV as a material consideration</b>	Campaign for Real Ale (CAMRA), LB Islington	Clarification

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		<b>when assessing applications for a change of use and consider compulsory purchase orders where appropriate.</b>		
MSC.7.68	HC7 Paragraph 7.7.7	7.7.7 ...The pub should have been marketed <b>as a pub</b> for at least 24 months <del>as a pub</del> at an agreed price following an independent valuation, ...		Readability
MSC.7.69	HC7 Paragraph 7.7.8	7.7.8 ...Boroughs <del>are encouraged to</del> <b>should</b> resist such proposals or ensure developers put in place measures that would mitigate the impacts of noise for new and subsequent residents <b>(see Policy D12 Agent of change)</b> .	LB Camden, CAMRA	Clarification
<b>Chapter 8 Green Infrastructure and Natural Environment</b>				

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MSC.8.1	G1 B	B Boroughs should prepare green infrastructure strategies that <b>identify opportunities for cross-borough collaboration to ensure green infrastructure is optimised.</b> <del>integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation</del>	Natural England, Boroughs, The Environment Agency	Clarification
MSC.8.2	G1 CA	<i>Insert new clause CA</i> <b>CA Development proposals should incorporate appropriate elements of green infrastructure into London's network of green and open space.</b>	Individuals, Boroughs, London Sustainability Exchange	Clarification
MSC.8.3	G1 Paragraph 8.1.1	8.1.1 A <b>green infrastructure approach</b> recognises that the network of green <b>and blue</b> spaces, ...	Canal and River Trust, Boroughs	Clarification
MSC.8.4		8.1.1 ...street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a <del>more</del> -integrated way to meet multiple objectives. <b>Objectives</b>		Clarification

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		include <b>e</b> promoting mental and physical health and wellbeing; ...		
MSC.8.5	G1 Paragraph 8.1.1	8.1.1 ...adapting to the impacts of climate change <b>and the urban heat-island effect</b> ;...	London Wildlife Network Trust, London Environment Directors Network, Boroughs	Clarification
MSC.8.6	G1 Paragraph 8.1.1	8.1.1 ...improving air and water-quality; encouraging walking and cycling; <b>supporting landscape and heritage conservation</b> ; ...	Historic England	Clarification
MSC.8.7	G1 Paragraph 8.1.1	8.1.1 ... <b>learning about the environment</b> ; ...	Parks for London, Trees & Design Action Group, Boroughs, London Forum of Amenity and Civic Societies.	Clarification
MSC.8.8	G1 Paragraph 8.1.1	8.1.1 ... <b>supporting food growing</b> and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.	CFGN, London Food Link	Clarification

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MSC.8.9	G1 Paragraph 8.1.2	8.1.2 All development takes place within a wider environment and green infrastructure should be <del>seen as</del> an integral element and not <del>as</del> an 'add-on'. It's <b>economic and social value</b> <b>Should be recognised as</b> <del>has become increasingly evident across all of London at all scales and has been</del> highlighted in the London i-Tree Assessment and the Natural Capital Account for London's Public Parks <sup>102</sup> .	London Boroughs, individuals	Clarification
MSC.8.10	G1 Paragraph 8.1.3	8.1.3 To help deliver on his manifesto commitment to make <b>more than half of</b> London <del>at least 50 per cent</del> green by 2050, the Mayor will review and update existing Supplementary Planning Guidance on the All London Green Grid – London's strategic green infrastructure framework - to provide <b>guidance</b> on the strategic green infrastructure network and the preparation of green infrastructure strategies.	London Boroughs, individuals	Clarification

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MSC.8.11	G1 Footnote 101	<a href="https://www.forestry.gov.uk/pdf/LONDONI-TREECOREREPORT151202.pdf">https://www.forestry.gov.uk/pdf/LONDONI-TREECOREREPORT151202.pdf</a> <a href="https://www.forestry.gov.uk/london-itree">https://www.forestry.gov.uk/london-itree</a>		Update
MSC.8.12	G1 Footnote 102	<del>Published late 2017. Link unavailable at time of publication.</del> <a href="https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/green-infrastructure/natural-capital-account-london?source=vanityurl">https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/green-infrastructure/natural-capital-account-london?source=vanityurl</a>		Update
MSC.8.13	G2 B	B The extension of the Green Belt will be supported, where appropriate. Its de-designation will not <b>be supported</b> .		Clarification
MSC.8.14	G2 Paragraph 8.2.2	8.2.2 ...This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, <del>reducing the urban heat island effect</del> <b>and climate resilience</b> . ...		Clarification
MSC.8.15	G2	<i>Add Figure 8.1A – Green Belt and Metropolitan Open Land</i>		Clarification

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	Figure 8.1A			
MSC.8.16	G3 B - D	<i>Reordering and renumbering of clauses B, C and D to AB, AC and AA respectively.</i>		Readability
MSC.8.17	G3 AA + AB	<p><del>D-AA</del> Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:</p> <ol style="list-style-type: none"> <li>1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area</li> <li>2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London</li> <li>3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value</li> <li>4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.</li> </ol> <p><del>B-AB</del> The extension of MOL designations should be supported where appropriate.</p>		Readability



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MSC.8.18	G3 AC	<del>CAC</del> Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs; <b>ensuring that the overall quantum of MOL is not reduced, and that the value of the land designated as MOL is improved, having regard to all of the criteria in Part B</b>	Landscape Institute London	Clarification
MSC.8.19	G3 Paragraph 8.3.1	8.3.1 ... <b>MOL protects and enhances the open environment</b> and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, <b>food growing</b> , and health benefits through encouraging walking, running and other physical activity.	London Food Link/ Sustain	Clarification
MSC.8.20	G4 Title	Policy G4 <del>Local green and o-</del> <b>O</b> pen space.	London Boroughs	Clarification
MSC.8.21	G4	Amend and reorder Policy G4 by deleting A, amending C, inserting new clauses AA and AB, and renumbering B – D.		
MSC.8.22	G4 A	<del>A—Local green and open spaces should be protected.</del>	London Boroughs	Clarification

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Change ref no	Pol/para /table/map	Suggested change  <b>red bold</b> = new text; <del>red strikethrough</del> = deleted text	In response to	Reason

MSC.8.23	G4 AA	<p><b>AA Development Plans should:</b></p> <p><del>C-1) Boroughs should</del> undertake a needs assessment of <del>local green and</del> open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required<sup>105</sup>.</p> <p><del>E- Development Plans and Opportunity Area Frameworks Should:</del></p> <p>4) <b>1A)</b> Include appropriate designations and policies for the protection of open space to address deficiencies.</p> <p><del>B-2) 1B) promote</del> <del>the</del> creation of new areas of publicly-accessible <del>green and</del> open space <del>should be supported, especially in areas of deficiency in access to public open space particularly green space,</del> ensuring that future <del>green and</del> open space needs are planned for in areas with the potential for substantial change.</p> <p>3) <b>1C)</b> ensure that <b>secured green and</b> open space, <b>particularly green space remains</b></p>	London Boroughs, Individuals	Clarification
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		<del>publicly accessible. needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.</del>		
MSC.8.24	G4 AB	<p><i>Insert new clause AB and amend D to become a sub-clause of AB</i></p> <p><b>AB Development proposals should:</b></p> <p><b>1) where possible create areas of publicly accessible open space, particularly in areas of deficiency.</b></p> <p><del>D—1A) resist T</del>the loss of <b>protected green</b> and open spaces <del>s should be resisted</del> in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better-quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.</p>	London Boroughs, Individuals	Clarification
MSC.8.25	G4 Paragraph 8.4.1	8.4.1 <del>Green and O</del> pen spaces, <b>particularly those</b> —planned, designed and managed as green infrastructure – provide a wide	London Boroughs, Individuals	Clarification

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		<p>range of social, health and environmental benefits, and are a <b>vital component of London's infrastructure</b>. <del>Although individual spaces may not provide the strategic functions of Green Belt or MOL, they are nonetheless important</del> <b>All types of open space, regardless of their function are valuable in their ability to connect Londoners to open spaces</b> at the neighbourhood level. <del>as they are the spaces which most Londoners use most often.</del> Connectivity across the network of <del>green</del> <b>and</b> open spaces is particularly important as this provides opportunities for walking and cycling. <b>Green spaces are especially important</b> <del>and</del> for improving wildlife corridors.</p>		
MSC.8.26	G4 Paragraph 8.4.2	<p>8.4.2 Boroughs should undertake an <del>n green and</del> open space needs assessment, <b>which should be in-line with objectives in to</b> <del>inform their</del> <b>green infrastructure strategies (G1 Green Infrastructure)</b> (drawing from existing strategies such as play, trees and playing pitches). <b>These</b></p>	London Boroughs, Individuals	Clarification

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		<b>strategies sOpen-space strategies and assessments and Green-Infrastructure Strategies should inform each other to deliver multiple benefits in recognition of the cross-borough nature of some forms of green infrastructure.</b>		
MSC.8.27	G4 Paragraph 8.4.3	8.4.3 The creation of new <del>green-or</del> <b>particularly green space</b> , is essential in helping to meet the Mayor's <del>long-term</del> target of making more than 50 per cent of London green by 2050. <b>New provision or improved public access</b> should be particularly encouraged in areas of deficiency in access to public open space. It <del>will also be is</del> important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and <del>that</del> any conflicts between uses are minimised.	London Boroughs, Individuals	Clarification
MSC.8.28	G4 Paragraph 8.4.4	8.4.4 Proposals to <b>enhance green-and open spaces</b> to provide a wider range of benefits for Londoners will be encouraged. Examples could include improved public	London Boroughs, Individuals	Clarification

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		access <del>for all</del> , inclusive design, recreation facilities, habitat creation, landscaping improvement or <b>Sustainable Drainage Systems (SuDS)</b> <del>flood storage</del> .		
MSC.8.29	G4 Table 8.1	Small Open Spaces These include <b>public</b> gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas.	London Boroughs, individuals	Clarification
MSC.8.30	G5 BA	<i>Insert new clause BA...</i> <b>BA Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.</b>	London Boroughs, developers, campaign groups	Clarification
MSC.8.31	G5 Paragraph 8.5.3	8.5.3 ...This is based on a review of green space factors in other cities <sup>106</sup> . <b>The factors outlined in Table 8.2 are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits</b>	London Boroughs, developers, campaign groups	Clarification

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		<b>such as improved health, climate change adaption and biodiversity conservation.</b>		
MSC.8.32	G5 Paragraph 8.5.3A	<i>Insert new paragraph 3.5.3A</i> <b>8.5.3A</b> ...Residential development places greater demands on <b>existing</b> green infrastructure, and as such, a higher standard is justified.	London Boroughs	Readability and clarification
MSC.8.33	G5 Table 8.2	Semi-natural vegetation (e.g. <b>trees in natural soils</b> woodland, <del>species flower</del> -rich grassland) <b>maintained or established</b> <del>created</del> -on site.	Landscape Institute	Clarification
MSC.8.34	G5 Table 8.2	Wetland or open water (semi-natural; not chlorinated) <b>maintained or established</b> <del>created</del> -on site.		Clarification
MSC.8.35	G5 Table 8.2	Intensive green roof or vegetation over structure. <del>Vegetated sections only.</del> Substrate minimum settled depth of 150mm – see livingroofs.org for descriptions <sup>A</sup> .		Clarification
MSC.8.36	G5 Table 8.2	Standard trees planted <del>in natural soils or</del> in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature		Clarification

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		tree – see Trees in Hard Landscapes for overview <sup>B</sup> .		
MSC.8.37	G6 A	A Sites of Importance for Nature Conservation (SINCs) should be protected <del>The greatest protection should be given to the most significant sites.</del>	Natural England	Clarification
MSC.8.38	G6 B 1	B In developing Development Plan policies, boroughs should: 1) use <b>up-to-date information about the natural environment and</b> the relevant procedures to identify SINCs and <del>green ecological corridors to identify coherent ecological networks. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board</del>	London Wildlife Trust	Clarification
MSC.8.39	G6 B 3	B In developing Development Plan policies, boroughs should:… 3) <b>support the protection and conservation of priority species and</b>	London Wildlife Trust	Clarification



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		<b>habitats that sit outside of the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans.</b> <del>seek opportunities to create habitats that are of particular relevance and benefit in an urban context</del>		
MSC.8.40	G6 B 4	B In developing Development Plan policies, boroughs should:... 4) <del>include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations</del> <b>seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context.</b>	Natural England	Clarification
MSC.8.41	G6 B 5	B In developing Development Plan policies, boroughs should:... 5) ensure <b>designated</b> sites of European or national nature conservation importance are clearly identified and <del>appropriately</del> <b>impacts assessed in accordance with legislative requirements.</b>		Clarification

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MSC.8.42	G6 BA	<i>Insert new clause BA</i> <b>BA Where harm to a European Site or SSSI is unavoidable, a proposal must demonstrate that there are no alternatives and that there are Imperative Reasons of Overriding Public Interest (IROPI).</b>		Consistency
MSC.8.43	G6 C	C Where harm to a SINC ( <del>other than a European (International) designated site</del> ) is unavoidable, <b>and where the benefits of the development proposal clearly outweigh the impacts on biodiversity,</b> the following mitigation hierarchy <del>approach</del> should be applied to minimise development impacts:...	London Wildlife Trust	Clarification
MSC.8.44	G6 C 1	C ... to minimise development impacts:... 1) avoid <b>damaging</b> <del>adverse impact to</del> the <b>significant ecological features</b> <del>special biodiversity interest</del> of the site		Consistency
MSC.8.45	G6 C 2	C ... to minimise development impacts:...		Consistency

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		2) minimise the <b>overall</b> spatial impact and mitigate it by improving the quality or management of the rest of the site		
MSC.8.46	G6 C 3	C ... to minimise development impacts:... 3) seek appropriate <del>off-site</del> compensation <b>off-site based on biodiversity offsets, or other appropriate metric</b> <del>only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.</del>		Consistency
MSC.8.47	G6 D	D <b>Development proposals should aim to secure net biodiversity gain and be informed by the best available ecological information which</b> <del>Biodiversity enhancement</del> should be considered from the start of the development process.	Natural England	Clarification
MSC.8.48	G6 E	E Proposals which <del>create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to</del> reduce		Consistency

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		deficiencies in access to wildlife sites <b>should be considered positively.</b>		
MSC.8.49	G6 Paragraph 8.6.1	<p>8.6.1 <b>Sites of Importance for Nature Conservation</b> (SINCs) comprise:</p> <p><del>1. European sites (i.e. Special Protection Areas, Special Areas of Conservations (actual or candidate) and Ramsar sites)</del></p> <p><del>2. National sites (i.e. National Nature Reserves, Sites of Special Scientific Interest)</del></p> <p>3. Sites of Metropolitan Importance – strategically-important conservation sites for London</p> <p>4. Sites of Borough Importance – sites which support habitats or species of value at the borough level</p> <p>5. Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.</p> <p><b>N.b. Several Sites of Metropolitan Importance also have statutory European or national nature</b></p>	Natural England	Clarification

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		<b>conservation designations (see para 8.6.3)</b>		
MSC.8.50	G6 Figure 8.1B	<i>Add Figure 8.1B – Designated nature conservation sites</i>		Clarification
MSC.8.51	G6 Paragraph 8.6.1A	<i>Insert new paragraph 8.6.1A</i> <b>8.6.1A The level of protection afforded to SINCS should be commensurate with their status and the contribution they make to wider ecological networks. When undertaking comprehensive reviews of SINCS across a borough, or when identifying or amending Sites of Metropolitan Importance, boroughs should consult the London Wildlife Sites Board.</b>	London Wildlife Trust, Environment Agency	Clarification
MSC.8.52	G6 Paragraph 8.6.1B	<i>Insert new paragraph 8.6.1B</i> <b>8.6.1B Sites with a formal European or national designation (including Special Protection Areas, Special Areas of Conservation, Sites of special scientific Interest, National Nature Reserves and Local Reserves) are</b>	London Wildlife Trust, Natural England	Clarification

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		<p>protected <b>by under their own</b> legislation.  <b>There are legal provisions which ensure these sites are not harmed by development; there is a duty to consult Natural England on proposals that might affect these sites.</b> <del>For example, Special Protection Areas are protected under the EC Birds Directive and National Nature Reserves are protected under the Wildlife &amp; Countryside Act 1981. The higher up the above hierarchy a SINC is placed, the more any harm to it should be avoided. Before compensatory provision is identified as the only solution to a European site conflict, it is necessary to demonstrate that there are no alternatives to the European site and that Imperative Reasons of Overriding Public Interest (IROPI) exist which justify why the project should proceed.</del></p>		
MSC.8.53	G6 Paragraph 8.6.2	<p><i>Add text from paragraph 8.6.5</i>            8.6.2 ...The wildlife value of these sites must be protected and appropriate maintenance regimes should be established to maintain</p>		Clarification

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		<p>or enhance the wildlife value of sites, <b>recognising the additional pressure some sites may experience due to London's projected growth.</b> Improved <b>sustainable</b> access to wildlife sites should be secured, where appropriate, so that Londoners can better experience and appreciate the natural environment within the city. The connections between protected sites – green corridors – are often critical in helping to sustain wildlife populations that would be vulnerable if they were confined to isolated areas of habitat. <b>London's water spaces make up an important set of habitats in London. <u>Policy SI17 Protecting London's waterways</u> addresses the <del>multi-functional use,</del> protection and development of water spaces, with a particular priority for improving and restoring them <del>sections of river.</del> The habitat value of waterways is a key element of their future management.</b></p>		
MSC.8.54	G6 Paragraph 8.6.3	8.6.3 ...The London Environment Strategy includes guidance on identifying SINCS		Clarification and consistency

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		<b>(Appendix 5)</b> as well as habitat creation targets and a comprehensive list of priority species and habitats that require particular consideration when planning decisions are made.		
MSC.8.55	G6 Paragraph 8.6.4	<p><i>Amend 8.6.4 and combine with paragraph 8.6.3.</i></p> <p><del>8.6.4—The London Wildlife Sites Board offers help and guidance to boroughs on the selection of SINC<sup>107</sup>. <b>The relevant procedures for identifying SINC<sup>107</sup> are currently set out as Appendix 1 to the Biodiversity Strategy 2002, which will become an appendix to the final London Environment Strategy once adopted.</b></del></p>		Clarification and consistency
MSC.8.56	G6 Paragraph 8.6.5	<p><i>Move text to paragraph 8.6.2</i></p> <p><del>8.6.5—London's water spaces make up an important set of habitats in London. Policy SI17 Protecting London's waterways addresses the multi-functional use, protection and development of water spaces, with a particular priority for improving and restoring sections of river.</del></p>		Clarification and consistency



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		<del>The habitat value of waterways is a key element of their future management.</del>		
MSC.8.57	G7 A	A <del>Trees</del> <b>London's urban forest</b> and woodlands should be protected, <b>and maintained</b> and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees	London Tree Officers Association	Clarification
MSC.8.58	G7 B 1 New Footnote 107A	B In their Development Plans, boroughs should: 1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site <sup>107A</sup> . <i>Insert new footnote 107A</i> <b>Forestry Commission/Natural England (2018): Ancient woodland and veteran trees: protecting them from development</b> <b><a href="https://www.gov.uk/guidance/ancient-woodland-and-verteran-trees-prtoection-surveys-licences">https://www.gov.uk/guidance/ancient-woodland-and-verteran-trees-prtoection-surveys-licences</a></b>		Clarification

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MSC.8.59	G7 C Footnote 108	<p>C Development proposals should ensure that, wherever possible, existing trees of <b>quality value</b> are retained<sup>108</sup>. <b>If planning permission is granted that necessitates the removal of trees,</b><del>If it is imperative that trees have to be removed,</del> there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT <b>or other appropriate valuation system</b>. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.</p> <p><i>Amend footnote 108</i></p> <p>Category A<del>and</del>, B <b>and lesser category</b> trees <b>where these are considered by the local planning authority to be of importance to amenity and biodiversity,</b> as defined by BS 5837:2012</p>	London Tree Officers Association	Clarification
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MSC.8.60	G7 Paragraph 8.7.1	8.7.1 <b>Trees and woodlands play an important role</b> within the urban environment. They help to trap air pollutants, <b>add to amenity</b> , provide shading, absorb rainwater and filter noise. ...The Mayor and Forestry Commission, have produced <b>a London Tree and Woodland Framework</b> and Supplementary Planning Guidance on preparing tree strategies...	London Tree Officers Association	Clarification
MSC.8.61	G7 Paragraph 8.7.1 Footnote 109	8.7.1 ... to help boroughs plan for the management of the urban forest <sup>109</sup> . <i>Amend footnote 109</i> <del><a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland</a></del> <b><u>Forestry Commission – London:</u></b> <b><u><a href="https://www.forestry.gov.uk/London-policy">https://www.forestry.gov.uk/London-policy</a></u></b>		Clarification
MSC.8.62	G7 Paragraph 8.7.1	8.7.1 .....These, <b>and their successor documents</b> , should <b>inform policies and</b>		

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		<b>proposals in</b> <del>be part of</del> boroughs' wider green infrastructure strategies.		
MSC.8.63	G7 Paragraph 8.7.2 and footnote 110	8.7.2 The Mayor wants to increase tree <b>canopy</b> cover in London by 10 per cent by 2050. ...When preparing more detailed planning guidance boroughs are also advised to refer to <b>sources such as</b> Right Trees for a Changing Climate <sup>110</sup> and guidance produced by the Trees and Design Action Group <sup>111</sup> , <del>a multi-disciplinary cross-partnership forum seeking to promote urban forests.</del>  <a href="http://www.righttrees4cc.org.uk">http://www.righttrees4cc.org.uk</a>	London Tree Officers Association	Clarification and Factual Update
MSC.8.64	G7 Footnote 112	<del><a href="https://www.london.gov.uk/sites/default/files/valuing_londons_urban_forest_itree_report_final.pdf">https://www.london.gov.uk/sites/default/files/valuing_londons_urban_forest_itree_report_final.pdf</a></del>  <b>Valuing London's Urban Forest - Results of the London i-Tree Eco Project 2015</b> <a href="https://www.forestry.gov.uk/london-itree">https://www.forestry.gov.uk/london-itree</a>		Factual Update

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MSC.8.65	G7 Footnote 113	<del><a href="https://www.ltoa.org.uk/resources/cavat">https://www.ltoa.org.uk/resources/cavat</a></del> <b><a href="https://www.ltoa.org.uk/resources/cavat">https://www.ltoa.org.uk/resources/cavat</a></b>		Factual Update
MSC.8.66	G8 A	A In Development Plans, boroughs should: 1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within new developments <b>or as a meanwhile use on vacant or under- utilised sites</b>	London Food link	Clarification
MSC.8.67	G8 Paragraph 8.8.2	8.8.2 As provision for <b>small-scale</b> food growing becomes harder to deliver, innovative solutions to its delivery should be considered, such as green roofs and walls, re-utilising existing under-used spaces and incorporating spaces for food growing in <b>community schemes such as in new schools. Where sites are made available for food growing on a temporary basis landowners/ developers will need to be explicit over how long sites will be available to the community.</b>	Landscape Institute	Clarification

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MSC.8.68	G9 B	B- <del>Where relevant</del> , development proposals should:	London Geodiversity Partnership	Clarification
MSC.8.69	G9 Paragraph 8.9.2	8.9.2 <del>National planning policy is clear that boroughs should protect, promote and enhance geodiversity</del> . London's geodiversity sites are shown in Figure 8.1....	London Geodiversity Partnership	Clarification.
MSC.8.70	G9 Paragraph 8.9.2	8.9.2 ...Geodiversity sites with existing or proposed European or national designations are Sites of Special Scientific <del>Importance</del> <b>Interest</b> and subject to statutory protection. Boroughs should protect and enhance RIGSs and LIGSs through their Development Plans....	London Wildlife Trust	Factual update
MSC.8.71	G9 Paragraph 8.9.4	8.9.4 Where appropriate, access <del>for all</del> should be provided to geodiversity sites, although it is recognised that this is not always desirable. Geological sites will require appropriate <b>maintenance regimes</b> to ensure that these assets are properly protected and managed.		Readability
MSC.8.72	G9	<i>Renumber Figure 8.1 due to previous addition</i>		Consistency

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	Figure 8.1	Figure <del>8.18.2</del> – Geodiversity site		
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Chapter 9 Sustainable Infrastructure				
MSC.9.1	SI1 A 1 & 2	A 1) <del>D</del> development proposals should not...  2) <del>D</del> development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality		Readability
MSC.9.2	SI1 A 3	A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:  3) <del>The development of large-scale redevelopment areas, such as Opportunity Areas and</del> <b>masterplans and development briefs for large-scale development proposals</b> <del>these</del> subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality	London Boroughs	Clarification



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		Positive approach through the new development. <del>All other developments should be at least Air Quality Neutral.</del>		
MSC.9.3	SI1 A 3A	<i>Insert new clause SI1 3A</i> A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:.. <b>3A Major development proposals must be at least air quality neutral and be submitted with an Air Quality Assessment.</b>	London Boroughs	Clarification
MSC.9.4	SI1 A 4	A 4) <del>D</del> development proposals must demonstrate how they plan to comply with...		Readability
MSC.9.5	SI1 A 5	A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:		Consistency within the Plan-

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		<del>5) Air Quality Assessments (AQAs) should be submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use.</del>		
MSC.9.6	SI1 A 6	A 6) <del>D</del> development proposals should ensure that where emissions need to be reduced, this is done on-site...		
MSC.9.7	SI1 Paragraph 9.1.1	9.9.1 ... The impacts tend to be most heavily felt in some of London's most deprived neighbourhoods, and by people who are most vulnerable to the impacts. <b>The Mayor is committed to making air quality in London the best of any major world city, which means not only meeting and maintaining legal limits for Nitrogen Dioxide as soon as possible but also working to achieve World Health Organisation targets for other pollutants such as Particulate Matter.</b>	London Boroughs	Clarification

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MSC.9.8	SI1 Footnote 116	Air Quality Standards Regulations 2010, or subsequent revisions thereof <a href="http://www.legislation.gov.uk/uksi/2010/1001/contents/made">http://www.legislation.gov.uk/uksi/2010/1001/contents/made</a>		Factual Update
MSC.9.9	SI2 A	<p>A Major development should be net zero-carbon. This means reducing <del>carbon dioxide</del> <b>greenhouse gas</b> emissions <del>from in construction and</del> operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:</p> <p>1) <b>Bbe</b> lean: use less energy and manage demand during <del>construction and</del> operation.</p> <p>2) <b>Bbe</b> clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. <del>Development in Heat Network Priority Areas should follow the heating hierarchy in</del> <u>Policy SI3 Energy infrastructure.</u></p>	London Boroughs, London Tenants, LETI, London First, Individuals, Green Party, Friends of the Earth, Just Space, Solar Trade Association	Clarification and consistency within the plan

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		3) <del>Be</del> green: <b>maximise opportunities for renewable energy by generate-producing, storeing</b> and <b>using</b> renewable energy on-site		
MSC.9.10	SI2 A 3A	<b>A 3A) Be seen: monitor, verify and report on energy performance.</b>	LETI, UK Green Building Council, Solar Trade Association, London Boroughs, London Sustainable Development Commission, Hornsey & Wood Green Labour, Ashden, Levitt Bernstein, BWB Consulting, Fuel Poverty Action, Individuals	Clarification
MSC.9.11	SI2 B	B Major development <b>proposals</b> should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy <del>and will be expected to monitor and report on energy performance.</del>	LETI, UK Green Building Council, Solar Trade Association, London Boroughs, London Sustainable Development Commission, Hornsey & Wood Green Labour,	Clarification

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			Ashden, Levitt Bernstein, BWB Consulting, Fuel Poverty Action, Individuals	
MSC.9.12	SI2 C and footnote 117	C <del>In meeting the zero-carbon target a</del> <b>A</b> minimum on-site reduction of at least 35 per cent beyond Building Regulations <sup>117</sup> is <del>expected</del> <b>required for major development</b> . Residential development should <del>aim to</del> achieve 10 per cent, and non-residential development should <del>aim to</del> achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, <b>in agreement with the borough, either:</b> <ol style="list-style-type: none"> <li>1) through a cash in lieu contribution to the <del>relevant</del> borough's carbon offset fund, <del>and/or</del></li> </ol>	Ashden, LETI, Boroughs (Ealing, Greenwich), Boroughs (Merton), Green Party, Putney Society, ACE, London First, Southern Housing Group	Clarification

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		<p>2) off-site provided that an alternative proposal is identified and delivery is certain.</p> <p><sup>117</sup> Building Regulations 2013. If these are updated, the policy threshold will be reviewed</p> <p><a href="https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-1">https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-1</a></p>		
MSC.9.13	SI2 D	<p>D Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver <del>greenhouse gas carbon</del> reductions. The operation of offset funds should be monitored and reported on annually.</p>		Consistency within the Plan
MSC.9.14	SI2 DA	<p><i>Insert new paragraph SI2 DA</i></p> <p>DA <b>Major development proposals should calculate and minimise carbon emissions from any other part of the development, including</b></p>	London First, Canary Wharf Group, Clarion Housing Group, CIBSE, British Property Federation	Clarification

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		<b>plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.</b>		
MSC.9.15	SI2 DB	<i>Insert new paragraph SI2 DB</i> DB <b>Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.</b>	LETI, UK Green Building Council, Sustainability consultants (Etude, Levitt Bernstein etc) Just Space, Hornsey & Wood Green Labour, Individuals	Clarification
MSC.9.16	SI12 Figure 9.2	<i>figure 9.2 amended to show 'be seen' stage</i>	LETI	Clarification
MSC.9.17	SI2 Paragraph 9.2.4	9.2.4 A zero-carbon target for major residential developments has been in place for London since October 2016 <b>and applies to.</b> <del>This target will be extended to include major non-residential developments from 2019.</del> <del>on final publication of this Plan (expected 2019).</del>		Clarification

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MSC.9.18	SI2 Footnote 119	<sup>119</sup> Building Regulations 2013. If these are updated, the policy threshold will be reviewed. <a href="https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-1">https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-1</a>		Factual Update
MSC.9.19	SI2 Footnote 121	<sup>121</sup> For examples see London Environment Strategy <b>2018</b>		Factual Update
MSC.9.20	SI2 Paragraph 9.2.5A	<i>Insert new paragraph 9.2.5A</i> 9.2.5A <b>The Mayor recognises that Building Regulations use outdated carbon emission factors and that this will continue to cause uncertainty until they are updated by Government. Further guidance on the use of appropriate emissions factors will be set out in the Mayor's Energy Planning Guidance to help provide certainty to developers on how these policies are implemented.</b>		Clarification



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MSC.9.21	SI2 Paragraph 9.2.6	9.2.6 Developments are expected to achieve carbon reductions beyond part L from <b>energy efficiency measures</b> alone to reduce energy demand as far as possible. Residential development should <del>aim to</del> achieve 10 per cent and non-residential development should <del>aim to</del> achieve 15 per cent over part L.	Ashden, LETI, Boroughs (Ealing, Greenwich)	Clarification
MSC.9.22	SI2 Paragraph 9.2.7	9.2.7... However, <b>offset funds</b> <del>do</del> have the potential to unlock carbon savings from the existing building stock through energy efficiency programmes and by installing renewable technologies – typically more expensive to deliver in London due to the building age, type and tenure.		Readability
MSC.9.23	SI2 Paragraph 9.2.9	9.2.9... Major developments are required to monitor and report on energy performance, such as by displaying a Display Energy Certificate (DEC), and reporting to the Mayor for at least five		Readability

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		years via an online portal to enable the GLA...		
MSC.9.24	SI2 Paragraph 9.2.9A	<i>Insert new paragraph 9.2.9A</i> 9.2.9A <b>Operational carbon emissions will make up a declining proportion of a development's whole life carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a whole life-cycle approach is needed to capture its unregulated emissions (i.e. those associated with cooking and small appliances), its embodied emissions (i.e. those associated with raw material extraction, manufacture and transport of building materials, and construction) and emissions associated with maintenance and eventual material disposal). Whole life-cycle carbon emission assessments are therefore required for development proposals referable to the Mayor. Major non-</b>	LETI, UK Green Building Council, Sustainability consultants (Etude, Levitt Bernstein etc) Just Space, Hornsey & Wood Green Labour, Individuals	Clarification

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		<b>referable development should calculate unregulated emissions and are encouraged to undertake whole life-cycle assessments.</b>		
MSC.9.25	SI2 Paragraph 9.2.10	9.2.10... As a minimum, energy strategies should contain the following information: a. A calculation of the energy demand and carbon <del>dioxide</del> emissions covered by Building Regulations and, separately, the energy demand and carbon <del>dioxide</del> emissions from any other part of the development, including plant or equipment, that are not covered by the Building Regulations (i.e. the unregulated emissions), at each stage of the energy hierarchy. b. Proposals to reduce carbon <del>dioxide</del> emissions beyond Building Regulations through		Consistency within the Plan

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		<p>the energy efficient design of the site, buildings and services, whether it is categorised as a new build, a major refurbishment or a consequential improvement.</p> <p>c. Proposals to further reduce carbon <del>dioxide</del> emissions through the use of zero or low-emission decentralised energy where feasible, prioritising connection to district heating and cooling networks and utilising local secondary heat sources. (Development in Heat Network Priority Areas should follow the heating hierarchy in <u>Policy SI3 Energy infrastructure</u>).</p>			
MSC.9.26	SI2 Paragraph 9.2.10	9.2.10	d. Proposals to further reduce carbon <del>dioxide</del> emissions <b>through-by maximising opportunities to produce the</b>	Boroughs (Camden, H&F) Green Party, Friends of the Earth, Just Space, Solar	Clarification

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		<del>generation</del> and use <del>of on-site</del> renewable energy <b>on-site</b> , utilising storage technologies where appropriate.	Trade Assoc. Individuals	
MSC.9.27	SI2 Paragraph 9.2.10	9.2.10 h. <b>A plan for monitoring and annual reporting of</b> <del>Proposals for how</del> energy demand and carbon <del>dioxide</del> emissions post-construction <del>will be monitored annually</del> (for at least five years).		Clarification and readability
MSC.9.28	SI2 Paragraph 9.2.10	9.2.10 k. <del>Proposals to minimise the embodied carbon in construction</del> A whole life-cycle carbon emissions assessment, and actions to reduce life-cycle carbon emissions (for development proposals referable to the Mayor).	LETI, UK Green Building Council, Sustainability consultants (Etude, Levitt Bernstein etc) Just Space, Hornsey & Wood Green Labour, Individuals	Clarification
MSC.9.29	SI3 B 3	B... 3) major heat supply plant <b>including</b>	CIBSE, Boroughs (H&F), GLA Labour Group, London Waste	Clarification

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		4) <del>possible</del> opportunities to utilise <b>heat from energy from waste plants...</b>	and Recycling Board, North London Waste Authority	
MSC.9.30	SI3 B 11A	<i>Insert new clause SI3 B 11A</i> <b>11A) opportunities to maximise renewable electricity generation and incorporate demand-side response measures.</b>	London Sustainability Exchange, LETI, London Sustainable Development Commission, Individuals, Hoare Lea LLP, Siemens, Solar Trade Association, Friends of the Earth, Ashden	Clarification
MSC.9.31	SI3 D	Major development proposals within Heat Network Priority Areas should have a communal <b>low-temperature</b> heating system	The South East Waste Planning Advisory Group (SEWPAG), Arup, Chartered Institution of Building Services Engineers (CIBSE)	Clarification
MSC.9.32	SI3 D 1	D1... b) use <b>available zero-emission or</b> local secondary heat sources (in conjunction with heat pump, if		Clarification

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		required, <del>and a lower temperature heating system</del> <del>c) generate clean heat and/or power from zero-emission sources...</del>		
MSC.9.33	SI3 D 1	D1... <del>d) use fuel cells (if using natural gas in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)...</del>		Clarification and readability
MSC.9.34	SI3 D 1	D1... e) use low-emission combined heat and power (CHP) <b>(only where there is a case for CHP to enable the delivery of an area-wide heat network)</b> <del>(in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)</del>	London Boroughs, LEDNet, ClientEarth	Clarification and readability

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MSC.9.35	SI3 D 2	D2 CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that <b>they meet the requirements of policy SI1 (A) there is no significant impact on local air quality.</b>	Environment Agency	Consistency within the Plan
MSC.9.36	SI3 Paragraph 9.3.2	9.3.2... Decentralised energy will become an increasingly important element of London's energy supply and will help London become more self-sufficient <b>and resilient</b> in relation to its energy needs.		Clarification
MSC.9.37	SI3 Paragraph 9.3.2A	<i>Insert new paragraph 9.3.2A</i> <b>9.3.2A Many of London's existing heat networks have grown around combined heat and power (CHP) systems. However, the carbon savings from gas engine CHP are now declining as a result of national grid electricity decarbonising, and there is increasing evidence of adverse air quality impacts. Heat networks are still considered to be an effective</b>		Clarification



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		<b>and low-carbon means of supplying heat in London, and offer opportunities to transition to zero-carbon heat sources faster than individual building approaches. Where there remains a strategic case for low-emission CHP systems to support area-wide heat networks, these will continue to be considered on a case by case basis.</b>		
MSC.9.38	SI3 Paragraph 9.3.3	9.3.3... Data relating to new and expanded networks will be regularly captured and made publicly available <b>Major development proposals outside Heat Network Priority Areas should select a low-carbon heating system that is appropriate to the heat demand of the development, provides a solution for managing peak demand and avoids high energy bills for occupants.</b>		Clarification
MSC.9.39	SI3 Paragraph 9.3.5	9.3.5... The Mayor also supports the development of <b>low-temperature networks</b> for both new and existing	LETI	Clarification

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		systems as this allows cost-effective use of low-grade waste heat. <b>It is expected that network supply temperatures will drop from the traditional 90°C-95°C to less than 70°C depending on system design. Further guidance on designing and operating heat networks will be set out in the updated London Heat Network Manual.</b>		
MSC.9.40	SI3 Paragraph 9.3.6	<del>9.3.6 — Further information about the relevance of CHP in developments of various scales will also be provided in the Energy Planning Guidance document, which will be kept updated as technology changes. However, it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available. Low-emission CHP in this policy refers to those technologies which inherently emit very low levels of NOx. It is not</del>		Clarification

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		<b>expected that gas engine CHP will fit this category with the technology that is currently available. Further details on circumstances in which it will be appropriate to use low-emission CHP and what additional emissions monitoring will be required will be provided in further guidance. This guidance will be regularly updated to ensure that it reflects changes in technology.</b>		
MSC.9.41	SI3 Paragraph 9.3.7	9.3.7 Increasing the amount of <del>new</del> <b>renewable energy</b> <del>sources in London developments</del> is supported <b>and development proposals should identify opportunities to maximise renewable energy production on-site.</b> This includes the use of <del>energy from waste schemes that are connected to a heat network, as well as</del> solar photovoltaics, <b>heat pumps</b> and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind and hydropower-based renewable energy in some locations within	London Borough of Hammersmith and Fulham	Clarification

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		London. <b>Innovative low- and zero-carbon technologies will also be supported.</b>		
MSC.9.42	SI3 Paragraph 9.3.8	9.3.8... switch to electric <del>fy</del> <b>ifying</b> heating systems (such as through heat pumps)... <del>Energy masterplans are expected to identify any necessary electricity infrastructure.</del>		Clarification
MSC.9.43	SI3 Footnote 124	<sup>124</sup> Based on data from London Energy and Greenhouse Gas Inventory (LEGGI) <a href="https://data.london.gov.uk/dataset/leggi">https://data.london.gov.uk/dataset/leggi</a>		Factual Update
MSC.9.44	SI3 Paragraph 9.3.10	9.3.10 <del>National Grid Cadent Gas and Southern Gas Networks</del> <b>SGN</b> operate London's gas distribution network. Both companies are implementing significant <b>gasholder de-commissioning programmes</b> , replacing them with smaller gas pressure reduction stations...		Factual update
MSC.9.45	SI3 Figure 9.3	Heat Network Priority Areas <del>and Heat Density in London</del>		Clarification

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		Relative heat demand based on fuel use kWh/m <sup>2</sup> /year Remove layer showing areas where legal air quality limits are exceeded, and remove from key		
MSC.9.46	SI4 A	A Development proposals should minimise <del>internal heat gain and the</del> <b>adverse</b> impacts <del>on of</del> the urban heat island through design, layout, orientation, <del>and materials and the</del> <b>incorporation of green infrastructure....</b>	Environment Agency, Natural England, London Boroughs, Kent County Council, Chartered Institution of Building Services Engineers (CIBSE), Green Party, Twinn Sustainability, Trees and Design Action Group, landscape Institute	Clarification
MSC.9.47	SI4 B	B Major development proposals should demonstrate through an energy strategy how they will reduce the potential for <b>internal</b> overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:		Clarification

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MSC.9.48	SI4 B	<i>Reordering of clauses B 1 &amp; 2</i>	CIBSE	Clarification
MSC.9.49	SI4 B 2	B2) reduce the amount of heat entering a building through orientation, shading, <b>high</b> albedo <b>materials</b> , fenestration, insulation and the provision of green <del>roofs and walls</del> <b>infrastructure</b>	Environment Agency, Natural England, London Boroughs, Kent County Council, Chartered Institution of Building Services Engineers (CIBSE), Green Party, Twinn Sustainability, Trees and Design Action Group, landscape Institute	Clarification
MSC.9.50	SI4 Paragraph 9.4.1	9.4.1... This, combined with a growing population, <b>urbanisation</b> and the urban heat island effect, means that <b>London must manage heat risk</b> in new developments, using the cooling hierarchy set out above.		Consistency with other GLA strategies
MSC.9.51	SI4 Paragraph 9.4.2	9.4.2... These circumstances can lead many people to feel too hot or not be able to sleep, but for those with certain health conditions, and <b>'at risk' groups such as</b> some young or elderly Londoners,	Environment Agency, Natural England, London Boroughs, Kent County Council, Chartered Institution of	Clarification and Consistency with other GLA strategies

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		<p>the effects can <b>be serious and worsen health conditions be potentially lethal</b>. Green <del>infrastructure roofs</del> can provide some mitigation of this effect by shading roof surfaces and through evapotranspiration. <b>Development proposals should incorporate green infrastructure in line with Policies G1 Green infrastructure and G5 Urban greening.</b></p>	Building Services Engineers (CIBSE), Green Party, Twinn Sustainability, Trees and Design Action Group, landscape Institute	
MSC.9.52	SI4 Paragraph 9.4.3	<p>9.4.3 Many aspects of building design can lead to increases in overheating risk, including high proportions of glazing and an increase in the air tightness of buildings. <b>Single-aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, and should normally be avoided in line with Policy D4 Housing quality and standards.</b> There are a number of low-energy-<del>intensive</del> measures that can <b>mitigate overheating risk</b>. These include solar shading, building orientation and solar-controlled glazing. These include</p>	Chartered Institution of Building Services Engineers (CIBSE), London Boroughs Max Fordham LLP, Ashden, Individuals	Consistency within the Plan

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		solar shading, building orientation and solar-controlled glazing. <b>Occupant behaviour will also have an impact on overheating risk. The Mayor's London Environment Strategy sets out further detail on actions being taken to address this.</b>		
MSC.9.53	SI4 Paragraph 9.4.4	9.4.4 <b>Passive ventilation should be prioritised, taking into account external noise and air quality in determining the most appropriate solution.</b> The increased use of <b>air conditioning systems</b> is not desirable as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect. <del>Therefore, passive ventilation should be prioritised...</del>	CIBSE, Boroughs (Merton, Southwark) Barratts	Clarification
MSC.9.54	SI4 Paragraph 9.4.5	9.4.5... TM 59 should be used for domestic developments and TM 52 should be used for non-domestic developments. In addition, TM 49 guidance and datasets should also be used to ensure that all new development is		Clarification



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		designed for the climate it will experience over its design life. <del>The GLA's Energy Planning Guidance provides f</del> <b>Further information will be provided in guidance</b> on how these <del>guidance</del> documents and datasets should be used		
MSC.9.55	SI5 C New footnote 124A	C Development proposals should:... 2) achieve at least the BREEAM excellent standard <b>for the 'Wat 01' water category<sup>124A</sup> or equivalent</b> (commercial development) 3) <del>be encouraged to</del> incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.  <i>Insert new footnote 124A</i> <b>Achieve at least a 12.5% improvement over defined baseline performance standard</b>	London Boroughs, Hoare Lea, Developers	Clarification

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MSC.9.56	SI5 D	D In terms of water quality, Development Plans should:...  2) support <del>strategic</del> wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts...	Thames Water	Clarification
MSC.9.57	SI5 EA	<i>Insert new clause SI5 EA</i>  <b>EA Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage.</b>	Environment Agency, Thames Water, London Assembly, Green Party, Just Space, London Borough of Lewisham	Clarification
MSC.9.58	SI5 Paragraph 9.5.1	9.5.1 Londoners consume on average <del>156</del> <b>149</b> litres of water per person per day – around <del>17</del> <b>8</b> litres above the national average...		Factual update
MSC.9.59	SI5 Paragraph 9.5.2	<i>Amend footnote 125 as follows:</i>  Planning Practice Guidance: Paragraph 014 <b>of 'Housing: optional technical standards' (DCLG, 27 March 2015) Reference ID: 56-014-</b>		Factual update

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		<del>20150327</del> : Where there is a clear local need, <del>boroughs</del> <b>local planning authorities</b> can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement <b>of 110 litres/person/day</b> .		
MSC.9.60	SI5 Paragraph 9.5.4	<p>9.5.4 <b>Thames Water has set out in its draft Water Resources Management Plan its preferred approach to</b> <del>Variations of the following four</del> <b>strategic water supply options</b> to serve London <b>and parts of the Wider South East.</b> <del>are under consideration through Thames Water's Water Resource Management Plan process and one or a combination of some of these are expected to be proposed to serve parts of the Wider South East including London:</del> <b>These include:</b></p> <ul style="list-style-type: none"> <li><b>direct river abstraction from the Thames linked to augmenting river flows using treated sewage works effluent in east and west London</b></li> </ul>		Factual update

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		<ul style="list-style-type: none"> <li>• <del>treatment / re-use of effluent from sewage treatment works — likely within London</del></li> <li>• <del>desalination — potentially within London</del></li> <li>• <del>transfer of river water from the River Severn to the River Thames catchment</del></li> <li>• a new reservoir – likely to be near the Upper Thames in Oxfordshire.</li> </ul>		
MSC.9.61	SI5 Paragraph 9.5.5	9.5.5 The Mayor <del>is reviewing</del> <b>has reviewed</b> the available information on each of the supply options alongside evidence of their impacts on Londoners and Mayoral priorities. <b>A strategic approach to water supply networks to ensure future water resilience and in particular the timely planning for a new strategic water resource to serve London and the Wider South East is important.</b> In <del>preparing</del> its Water Resource Management Plans, Thames Water <del>is exploring</del> <b>has explored</b> coordinated		Clarification

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		supply options with the other water companies serving London and the South East of England through the Water Resource South East expert group. Water Resource East <del>is undertaking</del> <b>has undertaken</b> similar work in the East of England area. <b>A more strategic approach to water supply networks is supported to ensure future water resilience.</b> All this <del>will</del> <b>involves partnership working</b> with key stakeholders within London and beyond its boundaries.		
MSC.9.62	SI5 Paragraph 9.5.8	9.5.8 In relation to <b>wastewater and improvements to the water environment</b> , Water Framework Directive requirements should be maintained through the Thames River Basin Management Plan and the Catchment Plans prepared by the Catchment Partnerships, of which there are 12 in London. These Partnerships share lessons, experiences and best practice, and help achieve a coordinated approach to delivering the Thames River Basin	London Boroughs, Environment Agency	Consistency within the Plan and Clarification

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		<p>Management Plan. <b>Development Plans should be supported by evidence, which demonstrates that the development planned for</b></p> <p><b>a. will not compromise the Thames River Basin Management Plan objective of achieving 'Good' status, or cause deterioration in water quality; and</b></p> <p><b>b. will be supported by adequate and timely provision of wastewater treatment infrastructure.</b></p>		
MSC.9.63	SI15 Paragraph 9.5.10	<p>9.5.10 The Thames Tideway Tunnel is under construction and will help to improve the water quality of the River Thames by significantly reducing the frequency of untreated sewage being discharged into the Thames (known as combined sewer overflows). <del>Thames Water is also planning a major sewer tunnel in the Counters Creek catchment of west London.</del> <b>Sustainable drainage</b> measures are</p>	Royal Borough of Kensington and Chelsea, London Borough of Hammersmith & Fulham, Thames Water	Factual update

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		of particular importance in areas with sewer capacity limitations and their widespread implementation over the coming decades will help the resilience of London and avoid the need for further major sewer tunnel projects. <b>Thames Water is taking a long-term approach to drainage and wastewater management planning. Its London 2100 plan will identify the most appropriate strategy for ensuring London's drainage and wastewater systems can meet the needs of London over the next 80 years in the most sustainable way.</b>		
MSC.9.64	SI5 Paragraph 9.5.12	9.5.12 <del>Integrated Water Management Strategies should be considered for major development locations such as Opportunity Areas, where particular flood risk and water-related constraints such as limited sewer capacity require an integrated approach to the provision of infrastructure and management of risk</del> <b>Development Plans and</b>	Environment Agency	Clarification

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		<p><b>proposals should demonstrate that they have considered the opportunities for integrated solutions to water-related constraints and the provision of water infrastructure within strategically or locally defined growth locations. These could be Opportunity Areas or growth locations defined in Local Plans. Where such opportunities are identified, development plans should require an integrated and collaborative approach from developers. This could for example lead to the establishment of local water reuse systems or integrated drainage networks. Integration with the planning of green infrastructure could deliver further benefits.</b></p>		
MSC.9.65	SI5 Paragraph 9.5.13	9.5.13 A <b>water advisory group with representatives from across the water sectors in London</b> has been established to advise the Mayor <b>and share information</b> on strategic	London Borough of Hillingdon, Royal Borough of Kensington and Chelsea	Clarification



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		water and flood risk management issues <b>across the capital.</b>		
MSC.9.66	SI5 Figure 9.4	Update Figure - Addition of the Combined Sewer System		Consistency with other GLA strategies
MSC.9.67	SI5 Paragraph 9.5.14	9.5.14... The modelling does not consider how waste water is routed through the network, so it should be noted that some 'green' areas will flow into 'red' areas and hence increasing flows upstream will exacerbate performance in the downstream catchments. <b>The hatched area on the map shows the portions of the sewer system that are generally combined sewers, which means they capture both waste water and surface water flows.</b>		Consistency with other GLA strategies
MSC.9.68	SI6 A 1	A To ensure London's global competitiveness now and in the future, development proposals should:	Home Builders Federation, Developers	Clarification

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		<del>1) achieve greater digital connectivity than set out in part R1 of the Building Regulations</del>		
MSC.9.69	SI6 A 2	A To ensure London's global competitiveness now and in the future, development proposals should:  2) ensure that sufficient ducting space for <del>future digital</del> <b>full fibre</b> connectivity infrastructure is provided <b>to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users</b>	London Sustainability Exchange	Clarification
MSC.9.70	SI6 A 3	A To ensure London's global competitiveness now and in the future, development proposals should:  3) meet <del>requirements</del> <b>expected demand</b> for mobile connectivity <del>within</del> <b>generated by</b> the development <del>and</del>	Persimmon Homes	Clarification

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MSC.9.71	SI6 A 3	A To ensure London's global competitiveness now and in the future, development proposals should:  3A) take appropriate <del>mitigation</del> measures to avoid reducing mobile connectivity in surrounding areas; <b>where that is not possible, any potential reduction would require mitigation</b>		Clarification
MSC.9.72	SI6 A 4	A To ensure London's global competitiveness now and in the future, development proposals should:  4) support the effective use of <b>rooftops and</b> the public realm (such as street furniture and bins) to accommodate well-designed and <b>suitably</b> located mobile digital infrastructure.	Mobile UK	Clarification
MSC.9.73	SI6 Paragraph 9.6.3	9.6.3 <b>Better digital connectivity</b> with a focus on <b>capability</b> , affordability, security, resilience and the provision of appropriate electrical power supply should be promoted across the capital. The specific requirements of business clusters, such as a symmetrical- <b>capable</b> service with the same upload		Clarification

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		and download speeds, should also be met.		
MSC.9.74	SI6 Paragraph 9.6.4	<p>9.6.4 Given the fast pace at which digital technology is changing, a flexible approach to development is needed that supports <b>innovation and choice</b>. Part R1 of the Building Regulations 2010 requires buildings to be equipped with <del>high-speed</del> (at least 30 MB/s) ready in-building physical infrastructure, however new developments using <b>full fibre to the property or other</b> higher-grade infrastructure <del>could</del> <b>can</b> achieve connectivity speeds <del>closer to</del> <b>of</b> 1GB/s. <b>Developers should engage early with a range of network operators, and development proposals need to be appropriately designed to be capable of providing this level of connectivity to all end users. Mechanisms should also be put in place to enable further future infrastructure upgrades.</b></p> <p>Innovation is driving reductions in the size of infrastructure, with marginal additional unit costs, but greater digital</p>		Clarification and consistency within the plan

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		connectivity is needed in more locations.		
MSC.9.75	SI6 Paragraph 9.6.4A	<b>9.6.4A Development proposals should also demonstrate that mobile connectivity will be available throughout the development and should not have detrimental impacts on the digital connectivity of neighbouring buildings. Early consultation with network operators will help to identify any adverse impact on mobile or wireless connectivity and appropriate mitigation measures to avoid/mitigate them.</b>	Mobile UK	Clarification
MSC.9.76	SI6 Paragraph 9.6.4B	<b>9.6.4B Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified. Where possible, other opportunities to secure mobile connectivity improvements should also be sought through new</b>	Mobile UK	Clarification

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		<b>developments, including for example the creative use of the public realm.</b>		
MSC.9.77	SI6 Paragraph 9.6.5	9.6.5... (see <u>Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 <b>Industrial</b> intensification, co-location and substitution <del>of land for industry, logistics and services to support London's economic function</del></u> ).		Factual update
MSC.9.78	SI6 Paragraph 9.6.6	9.6.5 The Mayor will work with <del>providers</del> <b>network operators</b> , developers, councils and Government to develop guidance and share good practice to <b>increase awareness and capability</b> amongst boroughs and developers of the effective provision of digital connectivity and to support the delivery of policy requirements. The Mayor will also help to identify spatial gaps in connectivity and overcome barriers to delivery to address this form of digital exclusion, in particular through his <del>'not-</del>		Factual update

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		<del>spot</del> <b>Connected London</b> work. Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their digital strategies or corporate plans.		
MSC.9.79	SI6 Paragraph 9.6.7	9.6.7 Digital connectivity supports <b>smart technologies</b> in terms of the collection, analysis and sharing of data on the performance of the built and natural environment, including for example, <b>resource including</b> water and energy consumption, <b>waste</b> , air quality, noise and congestion...	London Waste and Recycling Board	Clarification
MSC.9.80	SI6 Figure 9.5	<b>Broadband speed 2016</b> ( <i>MAP TO BE AMENDED</i> ) Update with more recent data and bands from Ofcom.		Clarification
MSC.9.81	SI7 A 1	A Waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by <b>the Mayor, waste planning authorities</b>	London Waste and Recycling Board (LWarB), London Waste Planning Forum (LWPF), South East Waste Planning	Clarification

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		<p><b>and industry working in collaboration to:</b></p> <ol style="list-style-type: none"> <li>1) promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible</li> <li>2) encouraging waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of products</li> <li>3) ensuring that there is zero biodegradable or recyclable waste to landfill by 2026</li> <li>4) meeting or exceeding the recycling targets for each of the following waste streams and generating low-carbon energy in London from suitable remaining waste: <ol style="list-style-type: none"> <li>a) municipal waste<sup>127</sup> – 65 per cent by 2030</li> </ol> </li> </ol>	Advisory Group (SEWPAG)	
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		<p>b) construction, <b>and</b> demolition <del>and excavation</del> waste – 95 per cent by 2020</p> <p>5) design<del>ing</del> developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.</p>		
MSC.9.82	SI7 Paragraph 9.7.3	<p>9.7.3... The Mayor is committed to meeting or exceeding the <b>recycling targets</b> for each of the following waste streams, and to generating low-carbon energy in London from suitable remaining waste:...</p> <ul style="list-style-type: none"> <li>• construction, <b>and</b> demolition <del>and excavation</del> waste – 95 per cent recycling by 2020</li> </ul>	London Waste and Recycling Board (LWarB), South East Waste Planning Advisory Group (SEWPAG)	Clarification
MSC.9.83	SI7	<i>Insert new paragraph 9.7.3A</i>	Environment Agency	Clarification

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	Paragraph 9.7.3A	<b>9.7.3A Modelling suggests that if London achieves the reduction and recycling set out above, it will have sufficient Energy from Waste capacity to manage London's non-recyclable municipal waste, once the new Edmonton and Beddington Lane facilities are operational.</b>		
MSC.9.84	SI7 Paragraph 9.7.4A	<i>Insert new paragraph 9.7.4A</i> <b>9.7.4A It is recognised that the particular characteristics of excavation waste are such that it is extremely difficult to recycle this waste stream. The Mayor expects referable applications to demonstrate through a supporting Circular Economy Statement that the best environmental option practicable for the management of excavation material will be used. This could, for example, include using the material as a resource within the construction of the proposed</b>	London Waste Planning Forum (LWPF), Environment Agency	Clarification

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		<b>development or seeking opportunities for such material to be used in other local construction projects.</b>		
MSC.9.85	SI7 Paragraph 9.7.6	9.7.6 Further guidance on Circular Economy Statements will be produced. <b>These Circular Economy Statements are intended to cover the construction phase of development.</b>	South East Waste Planning Advisory Group (SEWPAG), London Boroughs	Clarification
MSC.9.86	SI8 B 3	B3 Development Plans should:... 3) identify the following as suitable locations to manage borough waste apportionments:... b) Strategic Industrial Locations and Locally Significant Employment Sites <del>Land</del>		Consistency within the Plan
MSC.9.87	SI8 Paragraph 9.8.1	9.8.1... The bulk of this waste is CD&E waste. Approximately 1.3mt of	London Boroughs, London Waste	Clarification

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		waste was exported overseas. <b>The term net self-sufficiency is meant to apply to all waste streams, with the exception of excavation waste. The particular characteristics of this waste stream mean that it will be very challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream.</b>	Planning Forum (LWPF)	
MSC.9.88	SI8 Paragraph 9.8.3	9.8.3... The Mayor will work with boroughs, the London Waste and Recycling Board, and the London and neighbouring Regional Technical Advisory Bodies to address <b>cross-boundary waste flow issues. An example of joint working would be ongoing updates to the London Waste Map and monitoring and management solutions for waste arisings from London.</b>	London Boroughs, London Waste Planning Forum (LWPF), South East Waste Planning Advisory Group (SEWPAG)	Clarification

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MSC.9.89	SI8 Paragraph 9.8.6	9.8.6... Boroughs are encouraged to collaborate by pooling their apportionment requirements. <b>Boroughs with a surplus of waste sites should offer to share these sites to those boroughs facing a shortfall in capacity before considering site release.</b>	London Boroughs	Clarification
MSC.9.90	S18 Footnote 133	<del><a href="http://www.london.gov.uk/priorities/environment/putting-waste-good-use/making-the-most-of-waste">http://www.london.gov.uk/priorities/environment/putting-waste-good-use/making-the-most-of-waste</a></del> <del><a href="https://www.london.gov.uk/file/665524/download?token=Q28HNWvK">https://www.london.gov.uk/file/665524/download?token=Q28HNWvK</a></del>		Factual Update
MSC.9.91	SI8 Paragraph 9.8.13	9.8.13 Examples of the ' <b>demonstrable steps</b> ' required under part D3 of Policy SI8 <u>Waste capacity and net waste self-sufficiency</u> are: <ul style="list-style-type: none"> <li>• <b>Aa</b> commitment to source truly residual waste – waste with as little recyclable material as possible.</li> <li>• <b>Aa</b> commitment (via a Section 106 obligation) to deliver the</li> </ul>		

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		<p>necessary means for infrastructure to meet the minimum CO<sub>2</sub> standard, for example investment in the development of a heat distribution network to the site boundary, or technology modifications that improve plant efficiency.</p> <ul style="list-style-type: none"> <li>• <b>Aa</b>n agreed timeframe (via a Section 106 agreement) as to when proposed measures will be delivered.</li> <li>• <del>T</del>the establishment of a working group to progress the agreed steps and monitor and report performance to the consenting authority.</li> </ul>		
MSC.9.92	SI9 Paragraph 9.9.2	9.9.2... When assessing the throughput of a site, the maximum throughput achieved over the last <del>three</del> <b>five</b> years should be used.	London Waste Planning Forum, London Boroughs	Clarification

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MSC.9.93	SI9 Paragraph 9.9.3	9.9.3... If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available elsewhere <b>in London</b> at appropriate sites over the Plan period...	South East Waste Planning Advisory Group SEWPAG,	Clarification
MSC.9.94	SI10 A	A An adequate supply of aggregates to support construction in London will be achieved by: <del>4) meeting the target of 95 per cent recycling/re-use of construction, demolition and excavation waste by 2020 and recycling 50 per cent of that waste as aggregates by 2020.</del>	London Aggregate Working Party (LAWP)	Clarification
MSC.9.95	SI10 B 1	<b>B 1)</b> Development Plans should make provision for the maintenance of a landbank (i.e. seven years' supply) of at least five million tonnes of land-won aggregates up to 2041, in	London Aggregate Working Party (LAWP)	Clarification

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		<p>particular through a landbank apportionment of:</p> <p><b>4a)</b> at least 1.75 mt to London Borough of Havering</p> <p><b>2b)</b> at least 0.7 mt to London Borough of Redbridge</p> <p><b>3c)</b> at least 1.75 mt to London Borough of Hillingdon</p> <p><b>4d)</b> at least 0.7 mt to London Borough of Hounslow.</p>		
MSC.9.96	SI10 B 2	<p><i>Insert new clause SI10 B 2</i></p> <p><b>B 2) ensure sufficient capacity of aggregates wharves and aggregate rail depots is available to ensure a steady and adequate supply of imported and marine aggregate to London.</b></p>		
MSC.9.97	SI10 B 3	<p><i>Insert new clause SI10 B 3</i></p> <p><b>B 3) support the production of recycled aggregate and, where practicable, expand capacity at/or adjacent to aggregate wharves and rail depots and quarries during their operational</b></p>		



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		<b>life, within or adjacent to major construction projects.</b>		
MSC.9.98	SI10 C	C All Mineral Planning Authorities in London should identify and safeguard <del>aggregate resources</del> in Development Plans, <del>including aggregate recycling facilities.</del> <b>sand and gravel resources from development that would otherwise sterilise future potential extraction.</b>	London Aggregate Working Party (LAWP)	Clarification
MSC.9.99	SI10 D	D To reduce the environmental impact of aggregates <b>facilities</b> , Development Plans should:... <b>2A) ensure planning conditions are imposed on new aggregate facilities so that noise, dust and traffic impacts are effectively controlled.</b> <b>2B) ensure new development in proximity to safeguarded sites are designed to avoid and mitigate potential conflicts, in line with the Agent of Change principle.</b>	London Aggregate Working Party (LAWP)	Clarification

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MSC.9.100	SI11 Paragraph 9.11.4	9.11.4 In addition to avoiding or mitigating adverse construction and operational impacts (noise, dust, visual intrusion, vehicle movements and lighting, on both the natural and built environment, including air quality and the water environment), any fracking proposal would need to take full account, where relevant, of the following <b>environmental constraints</b> :... <ul style="list-style-type: none"> <li>• <del>G</del>groundwater or surface water</li> </ul>		
MSC.9.101	SI12 B	B Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as <del>Surface Water Management Plan</del> <b>Local Flood Risk Management Strategies</b> , where necessary, to identify areas where particular <b>and cumulative</b> flood risk issues exist and develop actions and policy approaches aimed at reducing these risks...	London Borough of Bexley, Thames Regional Flood and Coastal Committee	Factual update and clarification

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MSC.9.102	SI12 C	C Development proposals <del>which require specific flood risk assessments</del> should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.	London Borough of Bexley	Clarification
MSC.9.103	SI12 F	F Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. <del>Where possible</del> <b>Unless exceptional circumstances are demonstrated for not doing so,</b> development proposals should <b>be</b> set <del>permanent built development</del> back from flood defences to allow for <b>any</b> foreseeable <b>future maintenance and upgrades in a sustainable and cost-effective way.</b>	Environment Agency, London Boroughs	Clarification
MSC.9.104	SI12 FA	<i>Insert new clause SI12 FA</i> <b>FA Natural flood management methods should be employed in development</b>	Environment Agency, Natural England, London Boroughs	Clarification

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		<b>proposal due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.</b>		
MSC.9.105	SI12 Paragraph 9.12.1	9.12.1 In London, the boroughs are <b>Lead Local Flood Authorities</b> (LLFAs) and are responsible, in particular, for local surface water flood risk management and for maintaining a <del>register of</del> flood risk <b>management assets register</b> . They <del>identify areas of flood risk to help inform appropriate locations for development</del> <b>produce Local Flood Risk Management Strategies</b> . LLFAs should cooperate on strategic and cross-boundary issues.	London Borough of Greenwich	Factual update
MSC.9.106	SI12 Paragraph 9.12.3	9.12.3 The <del>Environment Agency's</del> <b>Thames Estuary 2100 Plan (TE2100)</b> , <b>published by the Environment Agency, and endorsed by Government</b> , focuses on a <b>partnership approach</b> to tidal flood risk management...	Environment Agency	Factual update

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MSC.9.107	SI12 Paragraph 9.12.4	9.12.4 The concept of <del>Lead</del> Local <del>Flood</del> Authorities producing <b>Riverside Strategies</b> was introduced through the TE2100 Plan to improve flood risk management in the vicinity of the river, create better access to and along the riverside, and improve the riverside environment...	Environment Agency, London Borough of Newham	Factual correction
MSC.9.108	SI12 Paragraph 9.12.5	9.12.5 The Environment Agency's Thames River Basin District <b>Flood Risk Management Plan</b> is part of a collaborative and integrated approach to catchment planning for water. <b>Measures to address flood risk should be integral to development proposals and considered early in the design process. This will ensure they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Natural flood risk management in the upper river catchment areas can also help to reduce risk lower in the</b>	Environment Agency, London Borough of Hillingdon	Clarification

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		<b>catchments.</b> Making space for water when considering development proposals is particularly important where there is significant exposure to flood risk along tributaries and at the tidal-fluvial interface. The Flood Risk Management Plan should inform the boroughs' Strategic Flood Risk Assessments		
MSC.9.109	SI12 Paragraph 9.12.6	9.12.6 In terms of mitigating <b>residual risk</b> , it is important that a strategy for <b>resistance and then resilience including</b> safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services...	London Borough of Greenwich, London Borough of Hillingdon	Clarification
MSC.9.110	SI12 Paragraph 9.12.7	9.12.6 <del>Development adjacent to flood defences will be required to protect the integrity of existing flood defences. Wherever possible it should be set back from the banks of watercourses and flood defences to allow their management, maintenance and</del>		Readability

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		<del>upgrading to be undertaken in a sustainable and cost-effective way.</del>		
MSC.9.111	SI13 A	A Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks. <b>Increases in surface water run-off outside these areas also need to be identified and addressed.</b>	London Borough of Merton	Clarification
MSC.9.112	SI13 B	B Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy. <b>There should also be a preference for green over grey features:</b>  1) <b>rainwater use as a resource (for example</b> rainwater harvesting, <del>(including a combination of green and blue roofs</del> <b>for irrigation)</b>	Environment Agency, London Boroughs	Clarification

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		<p>2) <b>rainwater</b> infiltration <b>to ground at or close to source</b> <del>techniques and green roofs</del></p> <p>3) rainwater attenuation in <del>open water</del> <b>green infrastructure</b> features for gradual release (<b>for example green roofs, rain gardens</b>)</p> <p>4) rainwater discharge direct to a watercourse (unless not appropriate)</p> <p><del>5) rainwater attenuation above ground (including blue roofs)</del></p> <p><del>6) rainwater attenuation below ground<sup>136</sup></del></p> <p>7) <b>controlled</b> rainwater discharge to a surface water sewer or drain</p> <p>8) <b>controlled</b> rainwater discharge to a combined sewer.</p>		
MSC.9.113	SI13 C	C Development proposals for impermeable paving should be refused <del>where appropriate</del> <b>unless they can be shown to be unavoidable</b> , including on small	London Boroughs	Clarification



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		surfaces such as front gardens and driveways.		
MSC.9.114	SI13 D	D Drainage should be designed and implemented in ways that <del>address issues</del> <b>promote multiple benefits including increased</b> of water use efficiency, <del>improve river</del> water quality, <b>and enhance</b> biodiversity, <b>urban greening</b> , amenity and recreation.	Environment Agency, Natural England, London Borough of Southwark, London Borough of Hillingdon	Clarification
MSC.9.115	SI13 Paragraph 9.13.1	9.13.1 London is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as <b>ensuring that appropriate</b> maintenance arrangements <b>are put in place</b> . <b>Local Flood Risk Management Strategies and Surface Water Management Plans</b> should ensure they address flooding from <del>sewers, drains</del> <b>multiple sources including surface water, and</b> groundwater, <del>and run-off from</del>	London Borough of Tower Hamlets, London Borough of Newham, London Borough of Hammersmith and Fulham	Clarification

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		<del>land</del> and small watercourses that occurs as a result of heavy rainfall.		
MSC.9.116	SI13 Paragraph 9.13.2	9.13.2 Development proposals should aim to get as close to greenfield run-off rates <sup>137</sup> as possible depending on site conditions. The well-established <b>drainage hierarchy</b> set out in this policy helps to reduce the rate and volume of surface water run-off. Rainwater should be managed as close to the top of the hierarchy as possible. <del>and t</del> There should be a preference for green over grey features, <b>and drainage by gravity over pumped systems...</b>		Clarification
MSC.9.117	SI13 Footnote 137	The runoff that would occur from a site in undeveloped <b>natural</b> state.		
MSC.9.118	SI13 Paragraph 9.13.3	9.13.3... This should include suitable pollution prevention <b>filtering</b> measures, <b>ideally by using soft engineering or green infrastructure. In addition, if direct discharge is to a watercourse where the outfall is</b>	Environment Agency	Clarification

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		<b>likely to be affected by tide-locking, suitable storage should be designed into the system...</b>		
MSC.9.119	SI14 BA	<i>Insert new clause</i> SI14 BA <b>BA Development Plans and development proposals should seek to maximise the multifunctional benefits waterways provide.</b>	London Borough of Sutton, Regents Network, Community Groups	Clarification
MSC.9.120	SI14 Paragraph 9.14.1	9.14.1...This <b>network of linked waterways – also known as the Blue Ribbon Network</b> - is of strategic importance for London. Every London borough contains some waterways – 17 border the Thames and 15 contain canals (see Figure 9.6)	London Borough of Hillingdon, Canal and River Trust, London Parks and Gardens Trust, London Wildlife Trust, Regents Network, Just Space	Clarification
MSC.9.121	SI14 Figure 9.6 (title)	Figure 9.6 - London's Network of Waterways <b>(the Blue Ribbon Network)</b>		Clarification
MSC.9.122	SI14 Paragraph 9.14.2	9.14.2 London's <b>waterways are multifunctional assets</b> . They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important	London Borough of Sutton, Regents Network, Canal and River Trust, Local community groups	Clarification

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		<p>heritage sites, landscapes, views, cultural and community activities; <del>and</del> <b>as well as</b> drainage, flood and water management <b>and urban cooling</b> functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners <b>and play a key role in place making of neighbourhoods. They also provide a home for Londoners living on boats. The waterways</b> <del>They</del> are protected and their water-related use - in particular safe and sustainable passenger and freight transport, tourism, cultural, community and recreational activities, as well as biodiversity - is promoted. Many of these functions are also supported by boroughs' local Riverside Strategies, the Environment Agency's Thames River Basin Management Plan and the Port of London Authority's Vision for the Thames. <b>In addition to the Thames, other water spaces, and in particular canals, have a distinct</b></p>		
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		<b>value and significance for London and Londoners.</b>		
MSC.9.123	SI14 Paragraph 9.14.4	9.14.4 The River Thames is a strategically-important and iconic feature of London. <b>It is a focal point for London's identity reflecting its heritage, natural and landscape values as well as cultural opportunities.</b> Its character changes on its way through London...	Historic England	Clarification
MSC.9.124	SI14 Paragraph 9.14.6	9.14.6 <b>Joint Thames Strategies</b> should cover:... <ul style="list-style-type: none"> <li>opportunities for environmental/<b>ecological</b> and urban design improvements...</li> <li><b>river crossings and other structures</b></li> </ul>	London Wildlife Trust, Environment Agency	Clarification
MSC.9.125	SI14 Paragraph 9.14.8	9.14.8 <b>Additional stretches of the</b> River Thames should not be designated as Metropolitan Open Land, as this may restrict the use of the river for transport infrastructure related uses.	London Borough of Richmond, Historic England, Kew Society, Regents Network, West London River Group	Clarification

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MSC.9.126	SI14 Paragraph 9.14.9	9.14.9... The <b>South East Inshore Marine Plan</b> is currently under development as part of a suite of Marine Spatial Plans <sup>139</sup> <b>under the Marine Policy Statement...</b>	Marine Management Organisation	Clarification
MSC.9.127	SI15 B	B ...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 <b>in Greater London</b> . Proposals for a new strategic-scale boatyard site, at an appropriate site within London, will be supported.	London Forum of Amenity & Civic Societies	Clarification
MSC.9.128	SI15 C	C Development proposals to facilitate an increase in the amount of freight transported <del>by river</del> <b>on London's waterways</b> should be supported.	Regents Network, Cemex Ltd	Clarification
MSC.9.129	SI15 F	F Development proposals which increase the use of safeguarded wharves for waterborne freight transport, especially <del>on the</del> <b>reactivation of</b> wharves which are	Port of London Authority	Clarification

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		currently not handling freight by water, will be supported.		
MSC.9.130	SI15 Paragraph 9.15.2	9.15.2 The PLA and Transport for London's <b>Pier Strategy will</b> promote <del>s</del> extending river services to East London and its growth areas to encourage modal shift to the river. This will relieve road congestion and better integrate other forms of transport such as walking and cycling.		Factual update
MSC.9.131	SI15 Paragraph 9.15.5	9.15.5... The Mayor will regularly review wharf safeguarding to ensure the changing need for waterborne freight is addressed. <b>Where the transition of wharves from waterborne freight to other uses is acceptable, the re-use of those wharves for waterborne public transport use should be considered.</b>	Port of London Authority	Clarification
MSC.9.132	SI16 AA	AA Development proposals <del>for</del> <b>should protect and enhance, where possible,</b>		Clarification

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		<b>water-related</b> cultural, educational and community facilities and events, <b>and new facilities</b> should be supported and promoted, but should take into consideration the protection and other uses of the waterways.		
MSC.9.133	SI16 AB	AB Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally, and if the infrastructure does not negatively impact on navigation <b>or on the protection of the waterway (see Policy SI17 Protecting and enhancing the London's waterways)</b> .	London Wildlife Trust, London Borough of Tower Hamlets, London Borough of Newham	Clarification
MSC.9.134	SI16 D	D <del>New mooring facilities should be:</del> <b>Development proposals adjacent to waterways should protect and enhance, where possible, existing moorings. The provision of new moorings and required facilities should be supported and promoted, if they are</b>	London Borough of Enfield, National Bargee Travellers Association	Clarification



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MSC.9.135	SI16 D 1	D 1) <del>supported as part of development proposals, but should be</del> off-line from main navigation routes, in basins or docks, unless there are <del>no</del> negative impacts on navigation <b>or on the protection of the waterway (see Policy SI17 Protecting and enhancing London's waterways)</b>	London Wildlife Trust, London Borough of Tower Hamlets, London Borough of Newham	Clarification
MSC.9.136	SI16 D 1A	<b>D 1A) appropriately designed including the provision of wash mitigation, where necessary</b>	Port of London Authority	Clarification
MSC.9.137	SI16 E	E <del>Major development schemes adjacent to waterways should consider the provision of new moorings.</del>		Clarification
MSC.9.138	SI16 G	G Development proposals along waterways should <b>protect and enhance inclusive public access to and along the waterway front and</b> explore opportunities for new, extended, improved and inclusive access infrastructure <b>to/from the waterways.</b>		Clarification

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MSC.9.139	SI16 H	H Development proposals should improve and expand the Thames Path and the towpaths, <b>improve alignment with the waterway where relevant, enhance them as walking routes</b> , and provide better linkages to the transport network...		Consistency within the Plan
MSC.9.140	SI16 Paragraph 9.16.1	9.16.1 New development should utilise the waterways <b>(also known as the Blue Ribbon Network)</b> for transport purposes where possible, but also for active water-based leisure, and for informal waterside recreation or access. In order to make the maximum use of London's waterways a range of supporting infrastructure is required including jetties, moorings, slipways, steps and waterside paths <del>and cycleways</del> (piers, wharves and boatyards are addressed in <u>Policy SI15 Water transport</u> )...	London Borough of Hillingdon, Canal and Rivers Trust, London Parks and Gardens Trust, London Wildlife Trust, Regents Network, Just Space	Clarification and readability
MSC.9.141	SI16 Paragraph 9.16.2	9.16.2 <b>Moorings and moored boats are an integral part of the character of the waterways.</b> There has been a	London Borough of Enfield, National Bargee Travellers	Clarification

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		<p>significant increase in the number of boats on London's waterways (from 2,000 in 2010 to 5,000 in 2016), with a notable increase in central and eastern parts of London's canal network. There is a <b>deficit of residential, leisure, visitor and commercial moorings and required facilities (such as power, water, and waste disposal)</b> to meet the increase in demand. The Canal and River Trust is producing a London Mooring Strategy which will provide an overview of the number of people living on boats on the canal network. It will identify zones for potential additional moorings. Some community-based projects to create residential moorings may be considered as community-led housing (part A.4 of <u>Policy H2 Small sites</u>). In addition, a number of creative businesses such as artists' studios and post-production facilities are located on boats. <b>Development proposals for residential moorings in particular should consider</b></p>	Association, Port of London Authority	
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		<b>innovative solutions to address site-specific conditions, including wash, to enable the creation of new appropriate moorings without detrimentally impacting on navigation.</b>		
MSC.9.142	SI16 Paragraph 9.16.3	9.16.3 Historic steps and slipways to the Thames foreshore are vital for enabling access <del>for to/from</del> activities and events. The <b>Thames Path and the towpaths</b> are particularly important in terms of providing safe access for a large number of Londoners along the waterways, facilitating their enjoyment of the river as well as providing health and wellbeing benefits <b>as walking routes...</b>	Port of London Authority	Clarification
MSC.9.143	SI16 Paragraph 9.16.4	9.16.4 Complementing development proposals for cultural facilities and events, the Mayor's <b>is producing, in partnership with the Port of London Authority, a case for a Cultural Strategy Vision</b> for the River <b>Thames.</b> <b>It</b> aims to increase Londoners'		Factual update

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		engagement with the River <b>for culture and leisure purposes</b> , including <del>an increase in</del> night-time use and <del>engagement with</del> <b>focusing on</b> under-used areas. It also provides information on the heritage and importance of the River Thames <b>and its banks</b> to London's <b>cultural life, especially in Opportunity Areas.</b>		
MSC.9.144	Policy SI17 Title	Protecting <b>and enhancing</b> London's waterways		Clarification
MSC.9.145	SI17 AA	<i>Insert new clause SI17 AA</i> <b>AA Development Plans should support river restoration and biodiversity improvements.</b>	London Wildlife Trust	Clarification
MSC.9.146	SI17 A	A Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect <b>and improve</b> the foreshore, <b>the floodplain, riparian and adjacent terrestrial habitats, water quality as well as</b> <del>and increase</del> the heritage <del>and habitats</del> value, should be supported <del>if appropriate</del> . Development	London Wildlife Trust, Environment Agency	Clarification and readability

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		proposals to impound and <del>constrain</del> <b>narrow</b> waterways should be refused.		
MSC.9.147	SI17 B	B Development proposals should support and improve the protection of the distinct open character and heritage of waterways <b>and their setting</b> .	London Borough of Enfield	Clarification
MSC.9.148	SI17 C	C Development proposals into the waterways, including permanently moored vessels <del>and development into the waterways</del> should generally only be supported for water-related uses <b>or to support enhancements of water-related purposes</b> .	Berwin Leighton Paisner LLP	Clarification
MSC.9.149	SI17 D	D Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character, <del>and</del> environment <b>and biodiversity</b> and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness <b>and recognise these</b>	London Wildlife Trust, London Borough of Sutton, Regents Network	Clarification

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		<b>water spaces as environmental, social and economic assets.</b>		
MSC.9.150	SI17 E	E On-shore power at water transport facilities should be <del>provided</del> <b>considered</b> at wharves and residential moorings to help reduce air pollution.	Port of London Authority	Clarification
MSC.9.151	SI17 Paragraph 9.17.2	9.17.2... The specific siting of such facilities requires careful consideration so that navigation, hydrology, biodiversity and the character and use of waterways are not compromised. <b>The waterways should not be used as an extension of developable land in London, nor should parts be a continuous line of moored craft.</b>	West London River Group	Clarification
MSC.9.152	SI17 Paragraph 9.17.3	9.17.3... This includes the requirement in this policy to <del>provide</del> <b>consider providing</b> on-shore power at wharves and moorings.	Port of London Authority	Clarification

## Chapter 10 Transport

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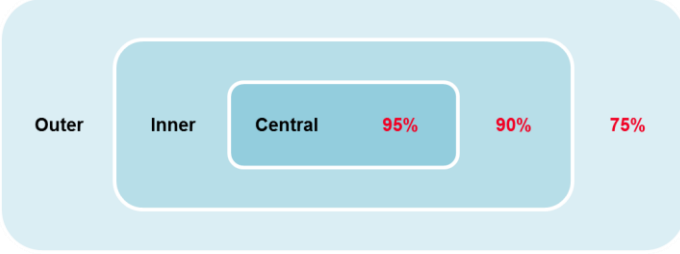
MSC.10.1	T1 A	A Development Plans and development proposals should support <b>and facilitate</b> :...	London Cycling Campaign	Clarification
MSC.10.2	T1 Paragraph 10.1.1	10.1.1... In order to help facilitate this, an integrated strategic approach to transport is needed, with an ambitious aim to reduce Londoners' dependency on cars in favour of increased walking, cycling and public transport use. Without this shift away from car use, <b>which the policies in the Plan and the Mayor's Transport Strategy seek to deliver</b> , London cannot continue to grow sustainably.		



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MSC.10.3	T1 Paragraph 10.1.3	10.1.3 The Mayor will work with partners to minimise <del>servicing and delivery</del> <b>freight</b> trips on the road network including through consolidation...		Consistency – within the Plan
MSC.10.4	T1 Paragraph 10.1.5	10.1.5 Rebalancing the transport system towards walking, cycling and public transport, including ensuring high quality interchanges, will require sustained investment including improving street environments to make walking and cycling safer and more attractive, and providing more, better-quality public transport services to ensure that alternatives to the car are accessible, affordable and appealing. <b>Achieving this is expected to result in different outcomes in different places, including modal splits in central, inner and outer London, as shown by Figure 10.1.</b>		Clarification

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MSC.10.5	T1 Figure 10.1A	<p><i>Insert new figure Figure 10.1A</i></p> <p><b>Figure 10.1A Mode shares in central, inner and outer London expected to be required for a city-wide 80 per cent share for walking, cycling and public transport</b></p> 		

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MSC.10.6	T2 C	C In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active <b>travel</b> and public transport <del>travel</del> . Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.		Clarification
MSC.10.7	T2 Paragraph 10.2.2	10.2.2 This Plan supports the implementation of the Mayor's Transport Strategy which aims to deliver the infrastructure and public realm required to significantly increase levels of walking, cycling and public transport use throughout London. It aims to make the city more accessible, <b>inclusive</b> and welcoming to all, so that every Londoner can be active every day, creating a healthier city, <del>inclusive of</del>	Just Space, The Access Association, Inclusive Design and Access Panel	Clarification

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		<b>for</b> people from all backgrounds, ensuring inequalities are reduced.		
MSC.10.8	T2 Paragraph 10.2.3	10.2.3 The Healthy Streets Approach is an evidence-based approach to improve health and reduce health inequalities, which will help Londoners use cars less, and walk, cycle and use public transport more. It supports the delivery of the Mayor's aim that by 2041 all Londoners will be able to undertake at least the 20 minutes of active travel each day needed to stay healthy. It also requires better management of freight so the impact of moving goods, <b>carrying out servicing</b> and <b>supporting construction delivering services</b> on London's streets is lessened. To <del>deliver</del> <b>apply</b> the Healthy Streets Approach, changes are required at strategic, network and street level.		Clarification

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MSC.10.9	T2 Paragraph 10.2.4	<p>10.2.4 Londoners' direct interaction with the Healthy Streets Approach will be through the streets they use every day. The Healthy Streets Approach aims to bring about positive changes to the character and use of the city's streets. High-quality, pleasant and attractive environments <b>with clean air</b> and enough space for dwelling, walking, cycling and public transport use must be provided. The dominance of vehicles should be reduced by using design to ensure slower vehicle speeds and safer driver behaviour. Measures <del>which</del> <b>that</b> improve Londoners' experience of individual streets, including greening, to encourage them to live active lives should be embedded within new development.</p>	Campaign for Better Transport, London Forum of Amenity and Civic Societies	Clarification
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MSC.10.10	T2 Paragraph 10.2.5	10.2.5... As part of this, the Mayor will work with the freight industry, its customers and London's boroughs to develop more creative solutions to managing freight <del>and deliveries</del> ...		Consistency within the plan
MSC.10.11	T3 B	<p>B Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by:</p> <p>1) safeguarding existing land and buildings used for <b>public</b> transport, <b>active travel</b> or <b>related</b> support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)...</p>	London Borough of Hammersmith and Fullham, Sustrans	Clarification

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		3) safeguarding <b>London's walking and cycling networks</b> <del>the Walk London Network protecting access to and improving the Thames Path and, where relevant, improving its alignment with the Thames.</del>		
MSC.10.12	T3 D	D In Development Plans and development decisions, <b>particular</b> priority should be given to <b>securing and supporting the delivery of</b> upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line eExtension, river crossings and an eastwards extension of the Elizabeth Line.		Clarification
MSC.10.13	T3 Table 10.1 (title row)	Scheme   Cost <sup>1</sup>   Timescale  1 low: <£100m, medium: £100m-£1bn, high: >£1bn		

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MSC.10.14	T3 Table 10.1	<b>A new Walk and cycle</b> river crossing <del>for pedestrians and cyclists</del> between Rotherhithe and Canary Wharf		Clarification
MSC.10.15	T3 Table 10.1	Bakerloo <del>L</del> line e <b>E</b> xtension.		Readability
MSC.10.16	T3 Table 10.1	<i>Insert new row</i> <b>Beam Park station   low   2020-2030</b>	London Borough of Havering	Clarification



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MSC.10.17	T3 Table 10.1	Coach hub(s) reprovision   medium   2020-20 <b>23</b> <del>30</del>		Clarification
MSC.10.18	T3 Table 10.1	<i>Insert new row</i> <b>Crossrail 2 eastern branch (subject to further assessment)   high  2020-2041</b>	London Borough of Newham	Consistency with other GLA Strategies
MSC.10.19	T3 Table 10.1	Heathrow Airport Southern Access (required <del>for</del> <b>if</b> airport expansion <b>proceeds</b> )   <del>medium</del> <b>high</b>  2020-2041	London Borough of Hammersmith and Fulham, Network Rail	Clarification

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MSC.10.20	T3 Table 10.1	Heathrow Airport Western Access (required <del>for</del> <b>if</b> airport expansion <b>proceeds</b> )   <del>medium-</del> <b>high</b>  2020-2041	London Borough of Hammersmith and Fulham, Network Rail	Clarification
MSC.10.21	T3 Table 10.1	<i>Insert new row</i> <b>London Overground extension - West London Orbital</b>	London Borough of Barnet and London Borough of Brent	Consistency with other GLA Strategies
MSC.10.22	T3 Table 10.1	Northern <del>L</del> line e <b>E</b> xtension.		Readability

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MSC.10.23	T3 Paragraph 10.3.3	<p>10.3.3 The Elizabeth <del>L</del>Line, due to open in 2019, will increase capacity within central London by about ten per cent, relieving crowding on the Tube network, <b>and</b> reducing journey times <del>from east and west London to central London and the Isle of Dogs,</del> and <del>reducing</del> congestion at <b>stations Paddington, Liverpool Street and in the West End.</b> This will mean that an extra 1.5 million people will be within 45 minutes' commuting distance of central London. The Elizabeth Line has been designed to allow for future increases in capacity, given the expected demand associated with an increasing population and growing employment in the areas it serves. <b>An eastward extension to the Elizabeth line could support thousands of new homes and jobs along the route in Bexley and north Kent. The extension could link to High Speed 1 at Ebbsfleet and boost rail</b></p>		Clarification
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		<b>connectivity throughout the Wider South East.</b>		
MSC.10.24	T3 Paragraph 10.3.5	10.3.5 Extending the Bakerloo <del>L</del> ine is also necessary to provide extra capacity on the Tube in south east London, enabling capacity for up to for 65,000 passenger journeys during the morning and evening peak. Increasing connectivity and reducing journey times will enable the Bakerloo <del>L</del> ine <del>E</del> extension to support more than 25,000 new homes and 5,000 jobs.		Readability
MSC.10.25	T3 Paragraph 10.3.5A	<i>Insert new paragraph 10.3.5A</i> <b>10.3.5A A key means of improving the efficiency of the transport network and unlocking growth potential is to eliminate physical barriers to movement, including in places</b>		Clarification

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		<b>where the Thames divides the communities on either side of it. Increasing the number and capacity of public transport links, as well as walking and cycling crossings, across the Thames will help to improve access to employment opportunities, support the development of thousands of new homes and enable healthier lifestyles.</b>		
MSC.10.26	T4 B	B... Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel <del>P</del> plans, <del>P</del> arking <del>D</del> esign and <del>M</del> anagement <del>P</del> plans, <del>C</del> onstruction <del>L</del> ogistics <del>P</del> plans and <del>d</del> Delivery and <del>s</del> ervicing <del>P</del> Plans will be required in accordance with relevant Transport for London guidance <sup>142</sup> .	N/A	Readability

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MSC.10.27	T4 D	D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission <del>may</del> <b>will</b> be contingent on the provision of necessary public transport and active travel infrastructure.	London Boroughs	Clarification
MSC.10.28	T4 Paragraph 10.4.1	10.4. 1 It is important that the impacts and opportunities which arise as a result of development proposals are identified and assessed so that appropriate mitigations and opportunities are secured through the planning process. <b>Transport assessments</b> are therefore necessary to ensure that planning applications can be reviewed and assessed for their specific impacts and for their compatibility with the Healthy Streets Approach. <b>Consideration of the potential</b>		Clarification

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		<b>impacts on internationally important wildlife sites should also be assessed, where required.</b>		
MSC.10.29	T4 Paragraph 10.4.4	10.4.4 <del>Ideally, a</del> <b>New</b> development that will give rise to significant numbers of new trips should be located in places well-connected by public transport, with capacity adequate to support the additional demand, or where there is a realistic prospect of additional access or capacity being provided in time to meet the new demand...	London Boroughs	Clarification
MSC.10.30	T5 A	A Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:... 2) securing the provision of appropriate levels of cycle parking	London Borough of Camden, The Access Association, Inclusive Design and Access Panel, Royal Borough of Kensington and Chelsea, Wheels for Wellbeing, London	Clarification

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		<p>which should be fit for purpose, secure and well-located.</p> <p>Developments should provide cycle parking <b>at least</b> in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, and should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. <b>Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.</b></p>	Borough of Havering, PFL Spaces, Arup	
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MSC.10.31	T5 AA	<b>AA Development Plans requiring more generous provisions of cycle parking based on local evidence will be supported</b>	London Borough of Hackney	Clarification
MSC.10.32	T5 E	E Where the final <del>land</del> use <b>class</b> of a development is not determined at the point of application, the highest potential applicable cycle parking standard should be applied.		Factual update

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MSC.10.33	T5 F	F <b>All development proposals should provide Aa</b> minimum of two short-stay and two long-stay cycle parking spaces <del>must be provided for all land uses in all locations except with the exception of Class C3-C4 uses and Class A uses</del> where the <b>a</b> size threshold <b>is</b> specified in Table 10.2 <b>and</b> has not been met	London Cycling campaign	Clarification
MSC.10.34	T5 Table 10.2 C3-C4 long stay requirement	1 space per studio or 1 person 1 bedroom dwelling 1.5 spaces per <b>2 person</b> 1 bedroom <del>unit</del> <b>dwelling</b> 2 spaces per all other dwellings	London Borough of Lewisham, London Borough of Ealing, British Land, Berkeley Group	Multiple respondents felt the 1.5 spaces for all 1 beds was an excessive requirement

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MSC.10.35	T5 Table 10.2 C3-C4 short stay requirement	<b>5 to 40 dwellings: 2 spaces</b> <b>Thereafter:</b> 1 space per 40 <del>units-dwellings</del>	London Cycling Campaign	Clarification
MSC.10.36	T5 Table 10.2 Station requirements	To be considered on a case by case basis through liaison with TfL. The level of provision should take into account the type and location of the station, current and future rail and cycle demand and the potential for journey stages to and from the station to be made by cycle. A <b>Future growth, though a</b> step-change in provision is expected, especially at termini, in order to meet the Mayor's mode share target.		Factual update

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MSC.10.37	T5 Paragraph 10.5.3	10.5.3 The minimum standards for short-stay (for visitor / customer) cycle parking for Class A Uses and long stay cycle parking (for employees) for office use in the boroughs identified on Figure 10.2 are thus set at twice the level as elsewhere – though the Mayor will support other boroughs adopting these higher standards <b>borough-wide or</b> for defined areas through their Development Plan documents (such as existing Mini-Hollands, and Liveable Neighbourhoods or Opportunity Areas).	London Borough of Enfield	Clarification
MSC.10.38	T5 Paragraph 10.5.6	10.5.6... For nurseries and primary schools, an appropriate proportion of <b>long-stay cycle parking spaces for students</b> <del>provision</del> may be met through scooter parking...		Clarification

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MSC.10.39	T5 Paragraph 10.5.9	<p>10.5.9 The provision of space for folding bicycles is <b>generally</b> not an acceptable alternative to conventional cycle parking, <del>as these cycles are only used by a minority of cycle owners, tend to be less affordable and can present difficulties for some users.</del> <b>An exception may be applied in office developments in the CAZ, where the location of rail termini lends itself to greater levels of folding bicycle use. This should only be applied for up to 10 per cent of long-stay spaces and where the full provision could not otherwise be provided.</b></p> <p>Provision of cycle hire caters for a different market of cyclist and also should not be accepted in lieu of cycle parking.</p>	City of London Corporation, PFL Spaces, HB Reavis UK Limited, Get Living London, Argent (Property Development) Services LLP, London Property Alliance	Clarification
MSC.10.40	T6 B	<p>B Car-free development should be the starting point for all development proposals in places that are (or are</p>	London Borough of Hillingdon, London Borough of Newham,	Clarification

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		planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). <b>Car-free development has no general parking but should still provide disabled persons parking in line with part D of this policy.</b>	London borough of Brent, London and Continental Railways, South West London and St George's Mental Health NHS Trust, David Bonnett Associates, Inclusive Design and Access Panel, Get Living London, The Access Association	
MSC.10.41	T6 BA	<b>T6 BB An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.</b>	Royal Borough of Greenwich, London Borough of Brent London Travel Watch, Aitch Group and an individual, as well as concerns about overspill parking from London Borough of Bromley, London Borough of Bexley, London Borough of Enfield, London Borough of Redbridge,	Clarification

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			Westminster City Council, London Borough Lewisham, London Borough of Barnet, London Borough of Richmond, Individuals	
MSC.10.42	T6 E new footnote 144A	<p>E Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles <b>in line with policies T6.1, T6.2, T6.3 and T6.4. All operational parking should make this provision, including offering rapid charging as required<sup>144A</sup>. New or redeveloped petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.</b></p> <p><i>Insert new footnote 144A</i></p> <p><b>Where operational parking spaces are provided on-street, such as loading bays, any physical infrastructure required should not negatively affect pedestrian amenity</b></p>	London Borough of Ealing, London Borough of Hackney, London Borough of Sutton, Arcadis LLP, Brixton Society	Clarification

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MSC.10.43	T6 F	F Adequate provision should be made for efficient deliveries and servicing <b>and emergency access.</b>	London Fire and Emergency Planning Authority, London Ambulance Service	Clarification
MSC.10.44	T6 G	G A <del>Car</del> <b>Parking</b> Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on <del>car</del> parking management and <del>car</del> parking design.	Wheels for Wellbeing	Readability
MSC.10.45	T6 H	H Boroughs wishing to adopt <b>more restrictive general or operational parking policies will be supported, including</b> borough-wide or other area-based car-free policies <del>will be supported</del> . Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within	London Borough of Hackney, London Borough of Enfield, London Borough of Hounslow, London Borough of Ealing, London Borough of Islington, City of London Corporation,	Clarification



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		the maximum standards set out in Policy T6.1 (Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential <del>land</del> uses <b>classes</b> in any part of London.	London Borough of Camden	
MSC.10.46	T6 I	I Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. <b>Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.</b>	Tesco Stores Ltd, Sainsbury's Supermarkets Ltd, Landsec, Clarion Housing Group	Clarification
MSC.10.47	T6 Paragraph 10.6.1	10.6.1 To manage London's road network and ensure that people and businesses can move about the city	Royal Borough of Greenwich, London Borough of Brent	Clarification

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		<p>as the population grows <b>and housing delivery increases significantly</b>, new parking provision must be carefully controlled. The dominance of vehicles on streets is a significant barrier to walking and cycling <del>and</del> reduces the appeal of streets as public places <b>and has an impact on the reliability and journey times of bus services</b>. Reduced parking provision can facilitate higher-density development and support the creation of mixed and vibrant places that are designed for people rather than vehicles. As the population grows, a fixed road network cannot absorb the additional cars that would result from a continuation of current levels of car ownership and use. Implementing the parking standards in this Plan is therefore an essential measure to support the delivery of new housing across the city. <b>In some areas, it will be necessary for boroughs to introduce additional parking controls to ensure new development is sustainable and</b></p>	<p>London Travel Watch, Aitch Group, London Borough of Bromley, London Borough of Bexley, London Borough of Enfield, London Borough of Redbridge, Westminster City Council, London Borough of Lewisham, London Borough of Barnet, London Borough of Richmond</p>	
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		<b>existing residents can continue to park safely and efficiently.</b>		
MSC.10.48	T6 Paragraph 10.6.2	10.6.2 Maximum standards for car parking take account of PTAL as well as London Plan spatial designations and <del>land</del> use <b>classes</b> ...		Factual update
MSC.10.49	T6 Paragraph 10.6.4	10.6.2 Where no standard is provided, the level of parking should be determined on a case-by-case basis taking account of Policy T6 Car parking, <b>current and future</b> PTAL and <del>future levels</del> <b>wider measures</b> of public transport, walking and cycling connectivity.	New Policy Institute	Clarification
MSC.10.50	T6 Paragraph 10.6.7	10.6.7 Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all <del>land</del> uses <b>classes</b> .		Factual update
MSC.10.51	T6 Paragraph 10.6.8	10.6. 8 <b>Where electric vehicle charging points are provided on-street, physical infrastructure should</b>		Clarification

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		<b>ideally be located off the footpath. Where charging points are located on the footpath, it must remain accessible to all those using it including disabled people.</b> <del>In order to meet the Mayor's target for carbon-free travel by 2050, all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles.</del>		
MSC.10.52	T6 Paragraph 10.6.8A	<i>Insert new paragraph 10.6.8A</i> <b>10.6.8A Surface-level car parking should be permeable where possible in accordance with Policy S113 Sustainable drainage.</b>	Thames Water	Clarification
MSC.10.53	T6.1 D	D Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking. <b>Any car club spaces should have active charging facilities.</b>		Clarification

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MSC.10.54	T6.1 G	<p>G Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:</p> <ol style="list-style-type: none"> <li>1) <b>ensure that for three per cent of dwellings, ensure that</b> at least one designated disabled persons parking bay <del>per dwelling for three per cent of dwellings</del> is available from the outset</li> <li>2) demonstrate on plan and as part of the <del>Car</del> Parking Design and Management Plan, how <b>an additional seven per cent of dwellings could be provided the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as with a</b> designated disabled persons parking <b>space in the future upon request. This should be provided as soon as existing</b></li> </ol>	Royal Borough of Greenwich, London Borough of Newham, London Borough of Lambeth	Clarification
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		<p><b>provision is shown to be insufficient</b> <del>If disabled persons parking provision is not sufficient, spaces should be provided when needed either upon first occupation of the development or in the future.</del></p>		
MSC.10.55	T6 Table 10.3	<p>Maximum parking provision*</p> <p>Car free<sup>-</sup></p> <p>Up to 0.25 spaces per <b>dwelling unit</b></p> <p>Up to 0.5 spaces per <b>dwelling unit</b></p> <p>Up to 0.75 spaces per <b>dwelling unit</b></p> <p>Up to 1 space per <b>dwelling unit</b></p> <p>Up to 1.5 spaces per <b>dwelling unit</b><sup>1 ^</sup></p> <p><b>* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed</b></p>	London Borough of Hackney, London Borough of Enfield, London Borough of Hounslow, London Borough of Ealing, London Borough of Islington, City of London Corporation, London Borough of Camden	Clarification

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		<p><b>~ With the exception of disabled persons parking, see Policy T6.1 G</b></p> <p><b>4 ^</b> Where small units (generally studios and one bedroom flats) make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit</p>		
MSC.10.56	T6 Paragraph 10.6.10	<p><del>Car</del> Parking Design and Management Plans should provide details of how initial and future provision of disabled persons parking spaces will be made, managed and enforced. They should show where these spaces will be located and demonstrate how their availability will be made clear to residents prior to occupation to inform their housing decision. Where a bay is being marked up for a particular resident, this should be done prior to occupation. Details should also be provided of how existing or future residents would request a bay, how quickly it could be created and what, if any, provision of visitor parking for disabled residents is available. <b>At In car-free developments, at</b> no time should any space</p>	Wheels for Wellbeing, Get Living London	Clarification

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		marked on plan for future disabled persons parking be used for general parking...		
MSC.10.57	T6 Paragraph 10.6.12A	<p><i>Insert new paragraph 10.6.12A</i></p> <p><b>10.6.12A Parking spaces should be leased rather than sold to ensure the land they take up is used as efficiently as possible over the life of a development. This includes enabling disabled persons parking bays to be used by those who need them at any given time and ensuring enlarged bays are available to be converted to disabled persons parking bays as required. Leasing allows for spaces with active charging points to serve electric or other Ultra-Low Emission vehicles, and can more easily support passive provision becoming active. Leasing also supports parking provision to be adaptable to future re-purposing, such as following changes transport technology or services.</b></p>	Get Living London, Galliard Homes	Clarification



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		<b>Leases should be short enough to allow for sufficient flexibility in parking allocation to reflect changing circumstances.</b>		
MSC.10.58	T6 Paragraph 10.6.12B	<p><i>Insert new paragraph 10.6.12B</i></p> <p><b>10.6.12B Car clubs count towards the maximum parking permitted because they share many of the negative impacts of privately owned cars. However in some areas, car club spaces can help support lower parking provision and car-lite lifestyles by enabling multiple households to make infrequent trips by car.</b></p>	London Borough of Camden, London Borough Richmond, London Borough of Redbridge, London Borough of Lambeth, Westminster City Council, London Assembly Transport Committee, London Assembly Planning Committee, Bexley Labour Group, Zipcar, Federation of Small Businesses, Berkeley Group, London Forum of Amenity and Civic Societies, Hoare Lea LLP, Highams Park Planning Group, MSP Strategies Ltd	Clarification

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MSC.10.59	T6.2 C	C Car parking <b>standards for provision at</b> Use Classes Order B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to these office parking standards, <b>and</b> take account of the significantly lower employment density in such developments., <del>and consider a</del> <b>A degree of flexibility may also be applied</b> to reflect different trip-generating characteristics. <b>In these cases, appropriate provision for electric or other Ultra-Low Emission vehicles should be made.</b>	London Borough of Ealing, London Borough of Hackney, London Borough of Sutton, Arcadis LLP, Brixton Society	Clarification
MSC.10.60	T6.2 G	G A <del>Car</del> <b>Parking</b> Design and Management Plan should be submitted alongside all applications which include car parking provision.	Wheels for Wellbeing	Clarification
MSC.10.61	T6 Table 10.4	Maximum parking provision* Car free <sup>^</sup>	London Borough of Hackney, London	Clarification

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		<p><b>* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed</b></p> <p><b>^ With the exception of disabled persons parking, see Policy T6.5</b></p>	Borough of Enfield, London Borough of Hounslow, London Borough of Ealing, London Borough of Islington, City of London Corporation, London Borough of Camden	
MSC.10.62	T6.3 A	<p>A The maximum parking standards set out in Table 10.5 should be applied to new retail development. <b>New retail development should avoid being car-dependent and should follow a town centres first approach, as set out in <u>Policy SD8 Town centres: development principles and Development Plan Documents.</u></b></p>	Lidl UK GmbH, Canary Wharf Group, Kew Society, Tesco Stores Ltd	Clarification
MSC.10.63	T6.3 EA	<p><i>Insert new clause T6.3 EA</i></p> <p><b>EA Where car parking is provided at retail development, provision for</b></p>	London Borough of Ealing, London Borough of Hackney, London Borough of	Clarification

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		<b>rapid electric vehicle charging should be made</b>	Sutton, Arcadis LLP, Brixton Society	
MSC.10.64	T6 Table 10.5	<p>Maximum parking provision*</p> <p>Car free<sup>^</sup></p> <p><b>* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed</b></p> <p><b>^ With the exception of disabled persons parking, see Policy T6.5</b></p>	London Borough of Hackney, London Borough of Enfield, London Borough of Hounslow, London Borough of Ealing, London Borough of Islington, City of London Corporation, London Borough of Camden	Clarification
MSC.10.65	T6 Paragraph 10.6.15A	<b>10.6.15A Where significant provision of car parking at retail development can be justified, provision of rapid electric vehicle charging facilities should be made. Supplementary Planning Guidance on what provision is required will be provided.</b>	London Borough of Ealing, London Borough of Hackney, London Borough of Sutton, Arcadis LLP, Brixton Society	Clarification

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MSC.10.66	T6 Paragraph 10.6.17	10.6.17 Hotels and leisure uses should be located in accessible locations to encourage walking, <del>and</del> cycling and public transport use. <b>Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed.</b>	London Borough of Hackney, London Borough of Enfield, London Borough of Hounslow, London Borough of Ealing, London Borough of Islington, City of London Corporation, London Borough of Camden	Clarification
MSC.10.67	T6 Table 10.6	Retail, recreation, <b>hotels</b> and leisure - 6 per cent - 4 per cent Transport car parks - 5 per cent - 5 per cent <b>Medical and health facilities - 6 per cent - 4 per cent</b> Religious buildings and crematoria - Minimum two spaces or 6 per cent, whichever is the greater - 4 per cent Sports facilities - Refer to Sports England Guidance	Sport England	Clarification

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MSC.10.68	T6 Paragraph 10.6.18	10.6.18... The provision of disabled persons parking bays should be regularly monitored and reviewed to ensure the level is adequate and enforcement is effective. <b>All proposals should include an appropriate amount of Some</b> Blue Badge parking, <del>should be providing at least one space provided</del> even if no general parking is provided.	Arup, Inclusive Design and Access Panel	Clarification
MSC.10.69	T7 – Policy title	<b>Freight and Deliveries, servicing and construction</b>		Clarification
MSC.10.70	T7 A	<b>Development Plans</b> , Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight <del>and servicing</del> strategies. These should seek to: <ul style="list-style-type: none"> <li>1) reduce freight trips to, from and within these areas</li> <li>2) coordinate the provision of infrastructure and facilities to manage freight <del>and servicing</del> at an area-wide level</li> </ul>		Clarification

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		3) <del>seek to</del> reduce <b>noise and</b> emissions from freight, such as through sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles...		
MSC.10.71	T7 C	C <del>Wharves and railheads involved in the distribution of aggregates should be safeguarded in line with <u>Policy SI9 Safeguarded waste sites</u>, <u>Policy SI10 Aggregates</u> and <u>Policy SI5 Water infrastructure</u>.</del> <b>Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include:</b> <ul style="list-style-type: none"> <li>○ <b>Planning history, environmental impact and its relationship to surrounding land use context –</b></li> </ul>	Port of London Authority, Freight on Rail, Network Rail	Clarification

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		<p><b>recognising that the agent of change principle will apply</b></p> <ul style="list-style-type: none"> <li>○ <b>Location, proximity to the strategic road network and existing/potential markets</b></li> <li>○ <b>Existing and potential contribution the railhead can make towards catering for freight movements by non-road modes</b></li> <li>○ <b>The location and availability of capacity at alternate railheads, in light of current and projected capacity and market demands.</b></li> </ul>		
MSC.10.72	T7 E	<p>E Development proposals for new consolidation and distribution facilities should be supported provided that they:...</p> <p>3) reduce <b>noise and</b> emissions from freight <del>and servicing</del> trips...</p>		Clarification



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MSC.10.73	T7 F	F Development proposals should facilitate sustainable <b>freight deliveries</b> and servicing, including through the provision of adequate space for servicing, <b>storage</b> and deliveries off-street...		Clarification
MSC.10.74	T7 I	I Development proposals must <b>consider the use of rail/water for the transportation of material and</b> adopt <del>appropriate</del> construction site design standards <del>to that</del> enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.	Freight on Rail, Brett group, Port of London Authority.	Clarification
MSC.10.75	T7 IA	<i>Insert new clause T7 IA</i> <b>IA The construction phase of development should prioritise and maintain inclusive, safe access for people walking or cycling at all times</b>	Westminster City Council	Clarification

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MSC.10.76	T7 Paragraph 10.7.2	<p>10.7.2 Currently many deliveries of non-urgent goods are made, unnecessarily, at congested times of the day. <del>Lorries and vans less than half full and as</del> <b>As</b> many as two in every three delivery slots are missed, leading to repeat trips that cause additional congestion and emissions. Many van and lorry trips could be avoided or re-timed if freight <del>and servicing</del> activity were better consolidated. Regional <b>consolidation and distribution</b> centres at the edge of London are needed to serve the city and town centres, coupled with micro-distribution centres in central and inner London. <del>The identification and protection of new sites for load consolidation at a range of scales in central, inner and outer London to aid sustainable last-mile consolidation is supported.</del></p>	John Lewis Partnership	Clarification
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MSC.10.77	T7 Paragraph 10.7.3	10.7.3 The Mayor will work with all relevant partners to improve the <b>safety and efficiency</b> of freight <del>and servicing</del> across London and support consolidation within and beyond London, as well as the retiming of movements to avoid peak hours. <b>Improved on-site storage can reduce the need for deliveries during peak hours.</b> Where kerbside loading is required it should be designed to minimise the impact on other road users and pedestrians and seek to minimise the transfer distance from vehicle to destination.		Clarification
MSC.10.78	T7 Paragraph 10.7.6	10.7.6... The plans should be monitored and managed throughout the construction and operational phases of the development. TfL's f Freight tools including CLOCS (Construction Logistics and Community Safety), <b>FORS Fleet Operator Recognition</b>	London Boroughs, Sustrans	Clarification

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		<p><b>Scheme) or equivalent</b> should be utilised to plan for and monitor site conditions to enable the use of vehicles with improved levels of direct vision. This should be demonstrated through a Site Assessment within a Construction Logistics Plan. Development proposals should demonstrate 'good' on-site ground conditions ratings or the mechanisms to reach this level.</p> <p><b>enabling the use of vehicles with improved levels of driver direct vision. To support the procurement of these vehicles and to minimise road danger, the Mayor has introduced his Direct Vision Standard, which rates HGVs on a star rating from 0 (lowest) to 5 (highest), based on how much the driver can see directly through their cab windows</b></p>		
MSC.10.79	T8 B	B The Mayor supports the role of <b>the airports serving</b> London's <del>airports</del> in		

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		enhancing <b>the city London's</b> spatial growth, particularly within Opportunity Areas well connected to the airports by public transport and which can accommodate significant numbers of new homes and jobs.		
MSC.10.80	T8 C	C The environmental <b>and health impacts</b> of aviation must be fully acknowledged and the aviation industry should fully meet its external and environmental costs particularly in respect of noise, air quality and climate change; any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.	London NHS Clinical Commissioning Group	Clarification
MSC.10.81	T8 I	I Development of general and business aviation activity should <b>generally</b> be supported providing this would not lead to additional environmental harm <b>or negative effects on health</b> , or		Clarification

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		<p>impact on scheduled flight operations. Any significant shift in the mix of operations using an airport – for example introduction of scheduled flights at airports not generally offering such flights – should <b>normally</b> be refused.</p>		
MSC.10.82	T8 Paragraph 10.8.4	<p>10.8.4 The Mayor recognises the need for additional runway capacity in the south east of England, but this should not be at the expense of London’s environment or the health of its residents. <del>Hundreds of thousands of Londoners are already exposed to illegal levels of air pollution and significant noise pollution as a result of Heathrow airport’s current operations and activities.</del> <b>Heathrow airport’s current operations are already a cause of concern for hundreds of thousands of Londoners, with its significant noise</b></p>	Heathrow Airport	Clarification

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		<b>impacts and illegal levels of air pollution.</b>		
MSC.10.83	T8 Paragraph 10.8.5	10.8.5 <b>Any A</b> airport expansion <b>proposals</b> should only be taken forward on the basis that noise impacts are avoided, minimised and mitigated, and proposals should not seek to claim or utilise noise improvements resulting from technology improvements unrelated to expansion...		Clarification
MSC.10.84	T8 Paragraph 10.8.6	10.8.6 <b>Any A</b> airport expansion <b>proposals</b> should not worsen existing air quality or contribute to exceedance of air quality limits, nor should <del>it</del> <b>they</b> seek to claim or utilise air quality improvements resulting from unrelated Mayoral, local or national policies and actions...		Clarification
MSC.10.85	T8 Paragraph 10.8.7	10.8.7 The Mayor will therefore strongly oppose any expansion of Heathrow Airport that would result	London City Airport	Clarification

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		<p>in additional environmental harm <b>or negative public health impacts</b>. Air quality gains secured by the Mayor or noise reductions resulting from new technology must be used to improve public health, not to support expansion. The Mayor also believes that expansion at Gatwick could deliver significant benefits to London and the UK more quickly, at less cost, and with significantly fewer adverse environmental impacts. Stansted Airport could, in due course, make better use of its single runway if its flight cap were raised, subject to appropriate environmental mitigation and controls. London City Airport is working to upgrade its passenger facilities and enhance operational efficiency in conjunction with <b>the introduction of additional environmental mitigation measures and what amounts to</b></p>		
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		<p><del>the introduction of additional environmental mitigation measures and what amounts to a</del> reduction of its maximum permitted number of movements <del>and the introduction of additional environmental mitigation measures...</del></p>		
MSC.10.86	T8 Paragraph 10.8.8	10.8.8... It will not be sufficient to rely on schemes designed to cater for background growth such as the Elizabeth <del>L</del> ine, Thameslink and Crossrail 2...		Clarification
MSC.10.87	T9 Paragraph 10.9.1 New footnote 146	<p>10.9.1... The Mayor's first MCIL (MCIL1) was introduced in 2012 to contribute to Crossrail 1 (the Elizabeth <del>L</del>ine) funding, and was designed as a single rate community infrastructure levy for each London borough, covering all development other than education and health...</p> <p><i>Insert new footnote 146B</i></p>		Clarification

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		<b>Devolution: a capital idea, London Finance Commission 2017</b>		
<b>Chapter 11 Funding the London Plan</b>				
MSC.11.1	DF1 A	A Applicants should take account of Development Plan policies when developing proposals and acquiring land. <b>Development proposals should provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan. ...</b>	London Boroughs	Clarification
MSC.11.2	DF1 D	D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and		

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		necessary public transport improvements, and following this: 1) <b>R</b> recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) <b>R</b> recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth.		
MSC.11.3	DF1 C	C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations, <b>ensuring that developments remain acceptable in planning terms.</b> ...	London Boroughs	Clarification
MSC.11.4	DF1 E	E Boroughs are also encouraged to take account of the <b>infrastructure prioritisation in</b> part D in developing their Community Infrastructure Levy Charging Schedule and <b>determining</b>	London Boroughs	Clarification

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		<b>the infrastructure that will be funded through borough CIL-Regulation-123 list.</b>		
MSC.11.5	DF1 Paragraph 11.1.4 New footnote 146A	11.1.4... These may include circumstances where an applicant is required to provide significant infrastructure improvements to facilitate delivery of a development (beyond the level that would typically be required for the scale of development) <sup>146A</sup> , or where the value generated by a development would be exceptionally low.  <i>Insert new footnote 146A</i> <b>The need for infrastructure provision to facilitate a site being brought forward for development or the presence of abnormal development costs will impact land value and the cost should not necessarily be born through a reduction in planning obligations.</b>	London Boroughs	Consistency with other GLA strategies
MSC.11.6	DF1 Paragraph 11.1.5	11.1.5... The application should be determined in accordance with the Development Plan, with the decision-	London Boroughs	Clarification

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		maker determining the weight to be given to viability alongside other relevant material considerations. <b>This should ensure that proposals remain acceptable in planning terms.</b>		
MSC.11.7	DF1 Paragraph 11.1.8 New footnote 146B	11.1.8 <b>London's growth is important for the whole of the United Kingdom. Almost a quarter of the country's output, and around 30 per cent of its economy-related tax take is generated in the Capital<sup>146B</sup>. For London to continue to grow as set out in this London Plan, Londoners will need access to genuinely affordable homes and good jobs, supported by necessary social infrastructure, transport, utilities, and green infrastructure. However, the Mayor currently possesses limited powers to fund affordable housing and infrastructure.</b> There is a significant gap between the public-sector funding required to deliver and support London's growth, and the		Clarification and readability

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		<p>amount currently committed to London. In many areas of the city, major development projects are not being progressed because of the uncertainty around funding. <b>In the short-term, it is therefore necessary for London and Londoners to have greater certainty over the public funding that central government plans to commit to the city's growth.</b></p> <p><i>Insert new footnote 146B</i></p> <p><b>Devolution: a capital idea London Finance Commission, 2017</b></p>		
MSC.11.8	DF1 Paragraph 11.1.11 Footnote 147	<p>London Infrastructure Plan 2015 – <b>can be downloaded here</b>  <a href="https://www.london.gov.uk/file/19038/download?token=1Zj5uQZf">https://www.london.gov.uk/file/19038/download?token=1Zj5uQZf</a></p>		Factual update
MSC.11.9	DF1 Paragraph 11.1.19	<p>11.1.19 In order to accelerate and / or de-risk housing development in the capital the Mayor is already making funding available, and he has secured <del>£3.154.82</del> billion to support</p>		Factual update

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		<b>11690,000</b> affordable housing starts by 202 <b>12</b> ...		
MSC.11.10	DF1 Paragraph 11.1.22	11.1.22... As a minimum, this role should mirror that operated by <del>the</del> Homes <b>England and Communities Agency</b> , which directly manages the release of surplus Government landholdings outside London.		Factual correction
MSC.11.11	DF1 Paragraph 11.1.28	11.1.28 Transport in London is funded through a combination of sources, including: <ul style="list-style-type: none"> <li>• Business Rate Retention under Mayoral control, which is replacing existing direct Government grants for operations and new capital investment from 2017-18</li> <li>• <del>R</del>revenue from fares and other 'user pays' sources (e.g. Congestion Charging)</li> <li>• <del>N</del>on-fare sources (e.g. advertising and property)</li> </ul>		Readability

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		<ul style="list-style-type: none"> <li>• <del>£</del> contributions from the London boroughs and the private sector, for example, developer funding for associated transport investments</li> <li>• <del>£</del> other specific grants</li> <li>• TfL 'prudential borrowing' against future revenue</li> </ul>		
MSC.11.12	DF1 Paragraph 11.1.29	11.1.29 In addition, for the Elizabeth Line project, there are specific ring-fenced funds (e.g. specific levies such as the Business Rate Supplement and Mayoral CIL). <b>The intention is that from April 2019 MCIL2 will supersede the current Mayor's Community Infrastructure Levy (MCIL1) and the associated planning obligation/S.106 charge scheme applicable in central London and the northern part of the Isle of Dogs. Subject to consultation and examination in public, MCIL2 will be ringfenced to</b>		Factual update



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		<b>contribute £4.5 billion of funding for Crossrail 2.</b>		
MSC.11.13	DF1 Paragraph 11.1.30	11.1.30...The Elizabeth Line, Northern Line extension, Overground extension <b>to Barking Riverside</b> and Silvertown Tunnel have identified funding packages and will be delivered in the early years of the Plan. ...		Factual correction
MSC.11.14	DF1 Paragraph 11.1.31 Footnote 149	<b>Devolution: a capital idea</b> , London Finance Commission 2017.		Factual Update
MSC.11.15	DF1 paragraph 11.1.34 Footnote 151	<b>Through the Department for Education's Basic Need/ and-Devolved Formula Capital funding.</b>		Factual Update
MSC.11.16	DF1 Paragraph 11.1.44	11.1.44...In general, decisions on where to invest in infrastructure are determined on a demand-led <b>or network capability and capacity</b> basis. ...		Clarification
MSC.11.17	DF1	Mayor's London Environment Strategy <b>2018.</b>		Factual Update

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	Paragraph 11.1.45 Footnote 153			
MSC.11.18	DF1 Paragraph 11.1.55	11.1.55...This is of concern because cultural infrastructure is important to local communities, to the tourism industry and to sustaining the creative economy, which is a source of significant employment growth and worth £427 billion to London's economy.		Factual Update
MSC.11.19	DF1 Paragraph 11.1.64 New footnote 155A	11.1.64 <del>In recognition of this, and following an invitation for TfL to bring forward proposals for funding infrastructure projects from land value uplift, the Government has agreed to establish a joint task force (including the GLA and TfL) to explore the options for piloting a Development Rights Auction Model on a major infrastructure project in London.</del> <b>Major transport investment can significantly increase the value of land, particularly if it is close to a train station or transport hub.</b>		Factual update

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		<p><b>Land value capture is a term used to describe the use of this increase in land value to fund investment in public services, such as transport. In 2017 the Government announced a taskforce<sup>155A</sup> to investigate a new way of paying for infrastructure projects, such as new public transport, including via land value capture. The Government asked the taskforce to look at the so called 'Development Rights Auction Model' of land value capture. TfL prepared a report, which studied the model in detail, and found that it would be unlikely to raise significant funding in London.</b></p> <p><i>Insert new footnote 155A</i></p> <p><b>The taskforce is led by the Ministry of Housing, Communities and Local Government and the Mayor of London's Office, and includes HM Treasury, the</b></p>		
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		<b>Department for Transport, TfL and London Councils.</b>		
MSC.11.20	DF1 Paragraph 11.1.65	11.1.65 There are a range of <b>other infrastructure investments and interventions that can increase the value of land, and</b> other options for capturing land value uplift. <del>and t</del> <b>The</b> Mayor will continue to work with government to explore all avenues for ensuring Londoners receive the vital infrastructure required to support growth.		Clarification
<b>Chapter 12 Monitoring</b>				
MSC.12.1	Policy M1 Table 12.1	Increase in the supply of new homes over the period (monitored against housing completions and the net pipeline of approved homes), towards meeting the 66,000 net additional homes needed each year up to <b>March 2029</b> <del>2030</del> .		Clarification
<b>Annex 1 Town Centre Network</b>				

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MSC.A1.1	Figures A1.1, A1.2, A1.3, A1.4 and A1.5	<i>All figures to be updated to align with changes to Table A1.1 noted below.</i>		
MSC.A1.2	Town Centre Network and Future Potential Network Classification	<b>District centres</b> – distributed more widely than Metropolitan and Major centres, providing convenience goods and services, <b>and social infrastructure</b> for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000–50,000 sqm of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions.	Levitt Bernstein	Clarification
MSC.A1.3	Figure A1.4 supporting text	<b>Office Guidelines</b> Table A1.1 and Figure A1.4 set out those town centres where specific approaches to offices are recommended, as informed by the London Office Policy Review <sup>A2</sup> <b>and borough evidence</b> .	Royal Borough of Kingston	Clarification
MSC.A1.4	Figure A1.4	Amend the second line in the key in Figure 1.4: " <b>A/potential</b> CAZ satellite".		Clarification

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MSC.A1.5	Table A1.1 - Town Centre Network	Knightsbridge – increase night time economy from NT3 to NT2	Westminster City Council, Marble Arch Partnership	Clarification
MSC.A1.6	Table A1.1 – Town Centre Network	Bexleyheath – increase commercial growth potential from Low to Medium	London Borough of Bexley	Clarification
MSC.A1.7	Table A1.1 – Town Centre Network	Bexleyheath – increase night time economy from NT3 to NT2	London Borough of Bexley	Clarification
MSC.A1.8	Table A1.1 – Town Centre Network	Wembley – classify as future potential metropolitan town centre	London Borough of Brent, individual, Brent Cyclists (LCC Local Group in Brent)	Clarification
MSC.A1.9	Table A1.1 – Town Centre Network	Camden Town – remove as future potential metropolitan town centre	London Borough of Camden, Camden Town CAAC, Chairs of Camden's Conservation Area Advisory Committees, the Camden HS2 Association of Resident's Groups for	Clarification

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			Engagement (CHARGE)	
MSC.A1.10	Table A1.1 - Town Centre Network	Southall – nominate night time economy as NT3	London Borough of Ealing	Clarification
MSC.A1.11	Table A1.1 - Town Centre Network	Hackney Central - reclassify from a district town centre to a major town centre	London Borough of Hackney	Clarification
MSC.A1.12	Table A1.1 - Town Centre Network	Streatham – increase night time economy from NT3 to NT2	London Borough of Lambeth	Clarification
MSC.A1.13	Table A1.1 - Town Centre Network	Canada Water – increase from district town centre to major town centre and remove future potential status as major town centre	London Borough Southwark	Clarification
MSC.A1.14	Table A1.1 - Town Centre Network	Peckham – nominate as ‘C - Protect small office capacity’ in office guidelines	London Borough Southwark	Clarification
MSC.A1.15	Table A1.1 - Town Centre Network	Wandsworth – nominate night time economy as NT3	London Borough of Wandsworth	Clarification

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MSC.A1.16	Table A1.1 - Town Centre Network	Petts Wood – decrease residential growth potential from medium to incremental	London Borough of Bromley, Jo Johnson MP, Petts Wood & District Residents' Association	Clarification
MSC.A1.17	Table A1.1 - Town Centre Network	West Wickham – decrease residential growth potential from medium to incremental	London Borough of Bromley	Clarification
MSC.A1.18	Table A1.1 - Town Centre Network	Herne Hill – add centre and nominate as district town centre	London Borough of Lambeth, Southwark	Clarification
MSC.A1.19	Table A1.1 - Town Centre Network	Stamford Hill – add centre, nominate as district town centre and identified a strategic area for regeneration	London Borough of Hackney	Clarification
MSC.A1.20	Table A1.1 - Town Centre Network	Leyton – nominate as Strategic area for regeneration	London Borough of Waltham Forest	Clarification



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MSC.A1.21	Table A1.1 - Town Centre Network	Southfields – remove from table	London Borough of Wandsworth	Clarification
MSC.A1.22	Table A1.1 - Town Centre Network	Edgware Road/Church Street – nominate night time economy as NT3	Westminster City Council	Clarification
MSC.A1.23	Table A1.1 - Town Centre Network	Edgware Road/Church Street – increase commercial growth potential from low to medium	Westminster City Council	Clarification
MSC.A1.24	Table A1.1 - Town Centre Network	London Bridge – decrease residential growth potential from medium to incremental	Team London Bridge	Clarification
MSC.A1.25	Table A1.1 - Town Centre Network	Edgware Road South – nominate night time economy as NT3	Westminster City Council,	Clarification
MSC.A1.26	Table A1.1 - Town Centre Network	Marylebone High Street - nominate night time economy as NT3	Westminster City Council,	Clarification

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MSC.A1.27	Table A1.1 - Town Centre Network	Marylebone Road – increase commercial growth potential from low to medium	Westminster City Council	Clarification
MSC.A1.28	Table A1.1 - Town Centre Network	Warwick Way/ Tachbrook Street - increase commercial growth potential from low to medium	Westminster City Council	Clarification
MSC.A1.29	Table A1.1 - Town Centre Network	Belvedere – nominate as future potential district town centre	London Borough of Bexley	Clarification
<b>Annex 2 Inner and Outer London Boroughs (No changes to this annex)</b>				
<b>Annex 3 Glossary</b>				
MSC.A3.1	Glossary (Abbreviations)	BREEAM Building Research Establishment <del>e</del> Environmental <del>a</del> Assessment <del>m</del> Method		Clarification
MSC.A3.2	Glossary (Abbreviations)	Public Transport Access <del>ibility</del> Level		Clarification
MSC.A3.3	Glossary (Abbreviations)	<b>SAC</b> <b>Special Areas of Conservation</b>		Clarification

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MSC.A3.4	Glossary (Definitions)	<p><b>Active provision for electric vehicles</b></p> <p>An <del>actual</del> socket <b>or equivalent</b> connected to the electrical supply system that vehicle owners can <b>use to plug recharge</b> their vehicle <del>into</del> (see also 'Passive provision for electric vehicles').</p>		Clarification
MSC.A3.5	Glossary (Definitions)	<p><b>Affordable housing</b></p> <p><b>See Policy H5.</b></p> <p><del>Affordable housing is Social Rented, Affordable Rented and Intermediate Housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. This is a broad definition of affordable housing and is consistent with the 2012 NPPF. Paragraphs 4.7.3–4.7.6 of this Plan set out the Mayor's preferred affordable housing tenures</del></p>		Clarification

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		<p><del><b>Social rented</b> housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.</del></p> <p><del><b>Affordable rented</b> housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable).</del></p> <p><del><b>Intermediate</b> housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.</del></p>		
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		<del>Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.</del>		
MSC.A3.6	Glossary (Definitions)	<p><b>Agent of Change principle</b></p> <p>The principle places the responsibility of mitigating the impact of <b>nuisances (including noise)</b> from existing <del>noise nuisance</del> generating <del>businesses-uses</del> on proposed new development close by, thereby ensuring that residents <b>and users</b> of the new development are protected from <del>noise nuisances</del>, and existing <del>businesses uses</del> are protected from <del>noise nuisance</del> complaints. Similarly, any new <del>noise nuisance</del> generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.</p>		Clarification
MSC.A3.7	Glossary (Definitions)	<p><b>Areas of Deficiency in access to nature</b></p> <p><b>Areas where people have to walk more than one kilometre to reach a publicly</b></p>		Clarification

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		<b>accessible Metropolitan or Borough Site of Importance for Nature (SINC).</b>		
MSC.A3.8	Glossary (Definitions)	<b>Areas of Deficiency in access to public open space Areas lacking in sufficient publicly accessible open space, as defined by a set of standards in Policy G4.</b>		Clarification
MSC.A3.9	Glossary (Definitions)	<b>Attributes (World Heritage Sites)  Attributes are tangible or intangible aspects of a World Heritage property which are associated with or express the Outstanding Universal Value (OUV) and can be the physical elements, the relationships between elements and / or time related processes. The UNESCO Operational Guidelines for the Implementation of the World Heritage Convention (the Operational Guidelines) indicate a range of types of attribute which might convey OUV, including form and design; materials and substance;</b>	Historic Royal Palaces	Clarification

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		<b>use and function; traditions: techniques and management systems; location and setting; language and other forms of intangible heritage; and spirit and feeling. Attributes identified for a property should flow from the adopted Statement of Outstanding Universal Value.</b>		
MSC.A3.10	Glossary (Definitions)	<b>Authenticity (World Heritage Sites)</b>  <b>Authenticity relates only to cultural properties and is about the link between attributes and Outstanding Universal Value. It is embodied in those characteristics that most truthfully reflect and embody the cultural heritage values of a place. They can be expressed in the variety of types of attributes listed in the definition of attributes (Operational Guidelines).</b>	Historic Royal Palaces	Clarification

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MSC.A3.11	Glossary (Definitions)	<b>Biodiversity offsets</b>  <b>Measures to improve existing or create replacement habitat where there are unavoidable impacts on wildlife habitats resulting from development or change of land use.</b>		Clarification
MSC.A3.12	Glossary (Definitions)	<b>Blue / water space</b>  <b>Areas covered by water including the River Thames and other rivers, canals, reservoirs, lakes and ponds.</b>		Clarification
MSC.A3.13	Glossary (Definitions)	<b>Brown roofs</b> <del>Roofs which have a layer of soil or other material which provides a habitat or growing medium for plants or wildlife.</del>		Clarification
MSC.A3.14	Glossary (Definitions)	<b>Car club</b> <del>These are schemes such as city car clubs and car pools, which facilitate vehicle sharing. A</del>		Clarification



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		<b>short-term car rental service that allows members access to cars parked locally for a per-minute, per-hour or per-day fee.</b>		
MSC.A3.15	Glossary (Definitions)	<p>Circular economy</p> <p>An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'</p>	London Borough of Camden, SEWPAG	Clarification
MSC.A3.16	Glossary (Definitions)	<p><b>Communal heating systems</b></p> <p><b>A communal heating system supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.</b></p>		Clarification

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MSC.A3.17	Glossary (Definitions)	<p><b>Community led housing</b></p> <p><b>Schemes that are genuinely community-led all share three common principles: meaningful community engagement and consent occurs throughout the development process (communities do not necessarily have to initiate the conversation, or build homes themselves); there is a presumption that the community group or organisation will take a long-term formal role in the ownership, stewardship, or management of the homes; and the benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity.</b></p>	Community Led Housing London	Clarification
MSC.A3.18	Glossary (Definitions)	<p><b>Conservation (heritage)</b></p>	Redington Frogna Neighbourhood Forum	Clarification

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MSC.A3.19	Glossary (Definitions)	<p><b>Construction, and demolition and excavation waste</b></p> <p>This is waste arising from the <b>excavation</b>, construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.</p>		Clarification
MSC.A3.20	Glossary (Definitions)	<p><b>Creative Enterprise Zone</b></p> <p><b>A Mayor of London initiative to establish clusters of creative production, which provide affordable premises and enterprise-related incentives for artists and creative businesses, pro-culture planning and housing policies, and offer career pathways and creative jobs for local communities and young people.</b></p>		Clarification

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MSC.A3.21	Glossary (Definitions)	<p><b>Decentralised energy</b></p> <p><b>A range of definitions exist for decentralised energy. In the context of the London Plan, it refers to low-and zero-carbon power and/or heat generated and delivered within London. This includes microgeneration, such as photovoltaics on individual buildings, through to large-scale heat networks.</b></p>	London Sustainable Development Commission	Clarification
MSC.A3.22	Glossary (Definitions)	<p><b>Freight</b></p> <p><b>A general term to refer to trips made for the purposes of delivering goods, enabling servicing activity or supporting construction.</b></p>		Clarification
MSC.A3.23	Glossary (Definitions)	<p><b>Green corridors</b></p> <p><del>This refers to r</del> <b>R</b>elatively continuous areas of open space leading through the built</p>		Clarification

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		environment, which may <del>be linked and may not be publicly accessible to each other</del> <b>and to the Green Belt or Metropolitan Open Land. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens.</b> They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.		
MSC.A3.24	Glossary (Definitions)	<b>Green cover</b>  <b>The total area covered by vegetation and water across London. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the</b>		Clarification

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		<b>wider built environment such as green roofs, street trees and rain gardens.</b>		
MSC.A3.25	Glossary (Definitions)	<p><b>Green infrastructure</b></p> <p>A network of green <b>and blue</b> spaces – and features such as street trees and green roofs - that is planned, designed and managed to deliver a range of benefits. These include <b>promoting mental and physical health and wellbeing; mitigating flooding, cooling the urban environment-adapting to the impacts of climate change and the urban heat-island effect; improving air and water quality; encouraging walking and cycling; supporting landscape and heritage conservation; learning about the environment; supporting food growing and conserving and</b> enhancing biodiversity and ecological resilience, <b>alongside more</b></p>	Redington Frogna Neighbourhood Forum	Clarification

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		<b>traditional functions of green space such as play, sport and recreation and as well as providing more attractive places for people.</b>		
MSC.A3.26	Glossary (Definitions)	<b>Green space</b>  <b>All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape.</b>		Clarification
MSC.A3.27	Glossary (Definitions)	<del>Green Space Factor</del> <del>A planning tool to ensure new developments provide adequate urban greening.</del>		Clarification

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MSC.A3.28		<b>Greening</b> The improvement of the appearance, function and wildlife value of the urban environment through <del>soft landscaping</del> <b>use of vegetation or water.</b>		Clarification
MSC.A3.29	Glossary (Definitions)	<b>Habitable Room</b> <b>A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, corridors, hallways, utility rooms or similar should not be considered habitable rooms.</b>	Orbit, Levitt Bernstein	Clarification
MSC.A3.30	Glossary (Definitions)	<b>Habitable Floorspace</b> <b>Habitable floorspace is all floorspace with a floor to ceiling height of 1.5m or over within a habitable room. Floorspace within habitable rooms with a floor to ceiling height of between 0.9m and 1.5m is counted as 50 per cent of its floor area and any floor</b>	Orbit, Levitt Bernstein	Clarification



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		<b>area with a floor to ceiling height lower than 0.9m is not counted as habitable floorspace.</b>		
MSC.A3.31	Glossary (Definitions)	<b>Health Impact Assessment (HIA)</b>  <b>Health Impact Assessment (HIA) is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.</b>		Clarification
MSC.A3.32	Glossary (Definitions)	<b>Health inequalities</b>  Health inequalities are systematic, avoidable and unfair differences in mental <b>and/or</b> physical health between groups of people. These differences affect how long people live in good health, and are mostly a result of		Clarification

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		differences in people's homes, education and childhood experiences, their environments, their <b>income</b> , jobs and employment prospects, their access to good public services and their <b>habits everyday opportunities to live healthier lives.</b>		
MSC.A3.33	Glossary (Definitions)	<b>Housing in multiple occupation (HMOs)</b> <del>Housing occupied by individuals of more than one household living together not as a family in non-self-contained accommodation.</del> <b>HMOs are dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet. HMOs for between three and six people are classed as C4 whereas HMOs for more than six people are Sui Generis.</b>		Clarification.
MSC.A3.34	Glossary (Definitions)	<b>Impermeable surface</b>		Clarification

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		<b>Mainly artificial structures (such as pavements, roads, driveways, parking areas and rooftops) that are covered by materials impenetrable to water (such as asphalt, concrete, brick and stone). Impermeable surfaces also collect solar heat in their dense mass. When the heat is released, it raises air temperatures (see 'Urban heat island').</b>		
MSC.A3.35	Glossary (Definitions)	<b>Integrity (World Heritage Sites)</b>  <b>Integrity is a measure of the completeness or intactness of the World Heritage property and its attributes which express the Outstanding Universal Value it holds (UNESCO Operational Guidelines).</b>	Historic Royal Palaces	Clarification
MSC.A3.36	Glossary (Definitions)	<b>Low Emission Zone (LEZ)</b> <del>A charging zone across most of Greater London for vehicles that do not meet emissions standards for particulate matter.</del> <b>A charging zone across most of Greater</b>		Clarification

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		<b>London for vehicles (excluding cars) that do not meet emissions standards.</b>		
MSC.A3.37	Glossary (Definitions)	<p><b>Main town centre uses</b></p> <p><b>Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</b></p>		Clarification
MSC.A3.38	Glossary (Definitions)	<p><b>Operational parking</b></p> <p><b>Parking for vehicles which are required for the function of a building or the activities within it. This can include spaces for fleet vehicles, taxis or loading bays, but does not include parking for personal travel such as commuting.</b></p>		Clarification

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MSC.A3.39	Glossary (Definitions)	<p><b>Outstanding Universal Value</b></p> <p><del>A property that has a</del> Cultural and/or natural significance that is so exceptional that it transcends national boundaries <b>and is of common importance for both present and future generations.</b> An <del>individual</del> <b>s</b>Statement of Outstanding Universal Value is <b>agreed and</b> adopted by <del>the UNESCO's intergovernmental</del> World Heritage Committee <b>for each World Heritage Site</b> at the time of its inscription <del>and may be subsequently amended by the Committee.</del> <b>This</b> Values can be <b>expressed by</b> physical, architectural or intangible <b>attributes that are</b> <del>They will be</del> embodied in the buildings, spaces, monuments, artefacts and archaeological deposits within the site, the setting and views of and from it. Statements of Outstanding Universal Value are key references for the effective protection and management of World Heritage Sites and can be found at <a href="http://whc.unesco.org/en/list">http://whc.unesco.org/en/list</a>.</p> <p><b>See also Attributes, Authenticity, and Integrity.</b></p>	Historic England	Clarification
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MSC.A3.40	Glossary (Definitions)	<p><b>Passive provision for electric vehicles</b></p> <p>The network of cables and power supply necessary so that at a future date a socket <b>or equivalent</b> can be added easily <b>to allow vehicle owners to recharge their vehicle</b> (see also 'Active provision for electric vehicles').</p>		Clarification
MSC.A3.41	Glossary (Definitions)	<p><b>Precision-manufactured homes</b></p> <p><b>Homes built using a high proportion of components which are produced using modern and technologically-driven methods of manufacture, with this production often taking place offsite and the components then assembled onsite.</b></p>	London Waste and Recycling Board (LWARB)	Clarification

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MSC.A3.42	Glossary (Definitions)	<p><b>Public Transport Accessibility Levels (PTALs)</b></p> <p>Public Transport Accessibility Levels (PTALs) are calculated across London using a grid of points at 100m intervals. For each point walk time to the public transport network is combined with service wait time (frequency) to give a measure of public transport network density.</p> <p>TfL has made pre-calculated PTALs available on WebCAT, its web-based connectivity assessment toolkit (<a href="http://www.tfl.gov.uk/WebCAT">www.tfl.gov.uk/WebCAT</a>). Users can view PTALs for any location in London alongside contextual information such as the local street network, rail stations and bus stops.</p> <p><b>Users can also view the PTALs resulting from planned improvements to and extensions of the public transport network. ....</b></p>		Clarification
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MSC.A3.43	Glossary (Definitions)	<b>Ramsar Site</b>  <b>Nature conservation site</b> <del>Designated</del> under the Convention on Wetlands of International Importance 1971.		Clarification
MSC.A3.44	Glossary (Definitions)	<b>Secondary materials (Waste)</b>  <b>Waste materials that can be used in reuse, recycling and re-manufacturing processes instead of or alongside virgin raw materials. This can include waste materials from demolition and excavation, or discarded items such as furniture and electrical products.</b>	London Waste and Recycling Board (LWARB), London Waste Planning Forum	Clarification
MSC.A3.45		<b>Significance (Heritage)</b>  <b>The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from</b>	Historic England	Clarification



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		<b>a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.</b>		
MSC.A3.46	Glossary (Definitions)	<p><b>Site of Importance for Nature Conservation (SINC)</b></p> <p><b>Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs, SINCs are not legally protected, but their value must be considered in any land use planning decision. Procedures for the identification of SINCs are set out in Appendix 5 of the Mayor's London Environment Strategy.</b></p>	Individuals	Clarification

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MSC.A3.47	Glossary (Definitions)	<p><b>Site of Special Scientific Interest (SSSI)</b></p> <p><b>Areas of land with ecological or geological interest of national importance. They are designated by Natural England</b> <del>A classification notified</del> under the Wildlife and Countryside Act (1981 as amended) <b>and have legal protection.</b> <del>All the London sites of biodiversity interest are included within sites of Metropolitan Importance for Nature Conservation.</del></p>		Clarification
MSC.A3.48	Glossary (Definitions)	<p><b>Special Policy Areas</b></p> <p>Areas that are defined locally <del>in specific and exceptional circumstances</del> <b>particularly</b> where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to London's unique identity, economic function or cultural heritage.</p>	Westminster City Council, Just Space	Clarification

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MSC.A3.49	Glossary (Definitions)	<p><b>Strategic Industrial Locations</b></p> <p>London's <b>largest concentrations</b> <del>main reservoirs</del> of industrial, logistics and related capacity for uses that support the functioning of London's economy.</p>	Just Space, Green Party Group, Vital OKR	Clarification
MSC.A3.50	Glossary (Definitions)	<p><b>Sustainable development</b></p> <p><b>There are three dimensions to sustainable development: economic, social and environmental. The economic role means contributing to a strong, responsive and competitive economy. The social role means supporting strong, vibrant and healthy communities. The environmental role means contributing to protecting and enhancing our natural, built and historic environment. To achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.</b></p> <p><del>Development that meets the needs of the present without compromising the ability of</del></p>	MHCLG, Historic England, London Assembly Planning Committee, Camden Town CAAC, Camden CAACs	Clarification

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		<del>future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.</del>		
MSC.A3.51	Glossary (Definitions)	<p><b>Urban greening</b></p> <p>Urban greening describes the <b>act of adding</b> green infrastructure elements that are most applicable in <del>central</del> London <del>and London's town centres</del>. Due to the morphology and density of the built environment in these <del>se areas</del> <b>city</b>, green roofs, street trees, and <b>additional vegetation techniques such as soft landscaping</b>, are the most appropriate elements of green infrastructure.</p>		Clarification

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MSC.A3.52	Glossary (Definitions)	<b>Urban Greening Factor</b>  <b>A land-use planning tool to help determine the amount of greening required in new developments.</b>		Clarification
MSC.A3.53	Glossary (Definitions)	<b>Visitor Accommodation</b>  <b>Leisure and business accommodation that provides temporary overnight accommodation on a commercial basis, including serviced accommodation such as hotels, bed and breakfast, guesthouses, hostels and campus accommodation, and non-serviced accommodation such as self-catering apart-hotels, caravans and camping.</b>		Clarification
MSC.A3.54	Glossary (Definitions)	<b>Water space</b>  <b>See Blue/water space. Area covered by water (permanently or intermittently), not adjacent land that is normally dry, and including the River Thames, other rivers</b>		Clarification

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		<del>and canals, and reservoirs, lakes and ponds.</del>		
MSC.A3.55	Glossary (Definitions)	<b>Whole life cycle carbon</b>  <b>Whole life-cycle carbon emissions are the total greenhouse gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/ construction, operation, maintenance and eventual material disposal.</b>		Clarification
MSC.A3.56	Glossary (Definitions)	<b>Zero-emission</b>  <b>Activity that causes no release of air pollutants and carbon dioxide or other greenhouse gases.</b>		Clarification