

# GREATER LONDON AUTHORITY

[REDACTED]  
(By email)

Our Ref: MGLA090920-3772

16 September 2020

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 9 September 2020. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for copies of all the representations made by the Mayor of London on neighbourhood plans at Regulation 9, 14 and 16 stages (Neighbourhood Planning Regulations 2012).

Our response to your request is as follows:

Please find attached the information we hold within scope of your request. Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

[REDACTED]  
**Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

**From:** [REDACTED]  
**Sent:** 09 May 2019 14:52  
**To:** [REDACTED]@barnet.gov.uk; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: GLA Officer Response: West Finchley Neighbourhood Plan – Regulation 14 Consultation  
**Attachments:** FINAL - West Finchley Neighbourhood Plan draft response.pdf

Dear [REDACTED]

Thank you for consulting the Mayor of London on the West Finchley Neighbourhood Plan (WFNP) (Regulation 14). As you are aware, all Development Plan Documents in London, including Neighbourhood Plans, must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 29 of the National Planning Policy Framework (NPPF) 2018, requires neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the WFNP includes the London Plan and Barnet's Local Plan. It should be noted that Barnet's Local Plan was adopted in 2012 and is now more than five years old and considered to be out of date.

The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have provided comments, which I have attached with this email.

This response sets out where you may need to amend proposed policies and supporting text to be more in line with the current London Plan and the emerging Draft New London Plan. As it stands the WFNP is in general conformity with the Draft New London Plan

### The draft new London Plan

The Mayor published his Draft London Plan for consultation on 1st December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan commenced on 15 January 2019 with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of Barnet's Development Plan and contain the most up-to-date policies.

Given the anticipated timetable for the submission of the WFNP, it is likely that it will be required to be in general conformity with the new London Plan. In addition, the Draft New London Plan and its evidence base are now material considerations in planning decisions.

### General

The Mayor welcomes the WFNP objectives listed at the start of each chapter making it easy for the reader to understand quickly the neighbourhood plan's most significant priorities. Officers would like to see more proactive objectives that would help deliver much needed housing across the capital and within the London Borough of Barnet in accordance with Good Growth Policy GG2 Making the best use of land. The Neighbourhood Plan should recognise that Barnet's housing target has recently increased from 2,349 to 3,134 homes per annum and ideally the neighbourhood plan should establish how it will positively contribute towards this in agreement with the London Borough of Barnet. Once 'made' Neighbourhood Plans form part of the Statutory Development Plan and should be aligned with the strategic needs of the wider local area. A proactive approach would also include site allocations which the WFNP lacks.

The WFNP's design guidance should be amended to meet the requirements set out in Policy D2 of the Draft New London Plan. Overall, the WFNP should be more proactive in positively supporting development within the area through site allocations, through identifying areas for change and by setting out what it considers to be appropriate in accordance with Policy D2 of the Draft New London Plan.

25% of the Barnet Community Infrastructure Levy (CIL) collected within the neighbourhood area will be available for local spending by the neighbourhood forum, once the WFNP has been formally adopted. The forum is advised to set out a list of priority projects to be funded by the CIL receipts it receives in agreement with the London Borough of Barnet. The current and Draft New London Plan (see Policy DF1) sets out the priorities for planning obligations. The inclusion of such priority spending projects would reinforce a more positive and proactive overall approach and one which would be supported by the Mayor.

## **Housing**

Chapter 5, objective 1 intends to protect family housing by resisting flatted developments and conversions. As the very first objective of the WFNP, it sets a very negative tone from the outset. Conversions and flatted development should be supported where this would positively contribute towards achieving Barnet's strategic housing target, a mix of housing types that reflects local need, and where the presumption in favour of small housing development would apply in accordance with Draft New London Plan Policy H2.

## **Town Centres**

Policy A1 Local parades of shops, is overly restrictive and should enable more flexibility and allow the introduction of wider town centre (non-A1 retail) uses in response to challenges brought about by multi-channel shopping, changes in consumer behaviour and advances in technology. Local parades should be allowed to diversify in response to rapid change taking place across the country. The full range of town centre uses set out in the glossary of the Draft New London Plan should be flexibly accommodated within draft Policy A1 and the WFNP should follow the guidance set out in Draft New London Plan Policy SD6, especially part B which calls for adaptation and diversification.

## **Transport**

The Healthy Streets approach is key strategic policy direction, which is detailed in the draft London Plan and the Mayor's Transport strategy. The Neighbourhood Plan, whilst containing Healthy Street principles, does not mention the Healthy Streets approach. TfL therefore recommend that the Neighbourhood Plan specifically references this approach within the Neighbourhood Plan. A key element of this approach is encouraging active travel, which in turn will support achieving the Mayor's target of 80 per cent of all journeys to be made by foot, cycle or public transport by 2041. In light of this, the Neighbourhood Plan should seek to create attractive streets and public realm which prioritise modes of active travel rather than the vehicle. In addition, the draft London Plan focuses on ensuring that Good Growth occurs within London. This includes directing growth towards the most accessible and well-connected places. There are areas within the Neighbourhood Plan which are considered to be accessible and well-connected, therefore TfL would encourage the Neighbourhood Forum to identify appropriate sites within these locations where development potential could be optimised.

## **Community facilities and air quality**

Policy A2, community facilities, – identification and protection of two existing community facilities is welcomed; namely Gordon Hall and Finchley Lawn Tennis Club. However, the plan could go further in proactively and positively exploring opportunities whereby these facilities might be enhanced and land may be used more efficiently in accordance with the Mayor's Good Growth Policy GG2 Making the best use of land, as set out in the Draft New London Plan. The WFNP could, for example, investigate whether both assets are capable of co-location with other uses which might serve the wider needs of the local community while providing the opportunity to carry out enhancements to the existing facilities.

Policy LE3 Air Quality. The Mayor welcomes the WFNP's ambition to maintain or improve air quality in accordance with the Mayor's Good Growth Policy GG3 Creating a healthy city. The policy could, in addition, positively promote the Mayor's Healthy Streets approach including the encouragement of active transport by walking, cycling and public transport and by discouraging the use of car journeys.

I hope you have found these comments helpful to inform the next version of the WFNP. If required, the Mayor will provide formal comments during the next round of consultation on the document. If you have any specific questions regarding the comments in this letter please do not hesitate to contact [REDACTED] [REDACTED] on 020 7084 [REDACTED] or at [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk).

Regards

[REDACTED]

**Senior Strategic Planner, London Plan Team**

**GREATERLONDONAUTHORITY**

City Hall, The Queen's Walk, London SE1 2AA

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**From:** [REDACTED]  
**To:** [REDACTED]@harlesdenneighbourhoodforum.com"  
**Cc:** [REDACTED]  
**Subject:** Harlesden Draft Neighbourhood Plan  
**Date:** 30 May 2017 18:01:01

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Dear [REDACTED]

Thank you for consulting the GLA on the Draft Harlesden Neighbourhood Plan. As you are aware, all Local Development Plan Documents including neighbourhood plans have to be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004.

The following is an officer level response to the Draft Harlesden Neighbourhood Plan:

The opportunity to comment on the Draft Harlesden Neighbourhood Plan is welcomed. Colleagues at Old Oak and Park Royal Development Corporation (OPDC) and Transport for London (TfL) have provided detailed comments on the draft Plan which are supported.

The draft Plan's positive approach to development and regeneration for the Harlseden Area is welcomed. However there are a couple of matters that merit comment.

- The Mayor recently consulted on his Affordable Housing and Viability Supplementary Guidance (SPG) and it might be useful to make reference to this and its approach.
- The proposed release of the bus depot on Station Road/Harley Road that forms part of the Park Royal SIL is contrary to London Plan Policy 2.17. TfL have provided detailed comments on this issue and they are supported. In particular, the strategic role of the depot, the cost of reproviding the facility and the lack of any suitable site being put forward by the draft Plan are of concern.
- The draft Plan makes reference to Table 3.2 in the London Plan and proposes that new housing should be developed at a density at the upper end of the range. However it is felt that the numbers of units proposed for some of the site allocations are conservative and they could support higher densities than suggested in the draft Plan. For example, the Royal Mail deliver office site could accommodate more than the 15 units proposed. The site on Harley Road has conflicting information – both 5 units and 15 units are suggested and there is no explanation given for the two storey height limit.

If you would like to discuss any of the above comments or any other issues, please do not hesitate to contact me.

Kind regards

[REDACTED]  
Senior Strategic Planner  
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Planning Policy  
Brent Civic Centre  
Engineers Way  
Wembley  
HA9 0FJ

**Department: Planning**  
Our reference: LDF04NPHA01  
Date: 20 September 2018

Dear Sir/Madam

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Harlesden Neighbourhood Forum – Submission Draft Neighbourhood Plan  
Consultation**

Thank you for consulting the Mayor of London on the draft Harlesden Neighbourhood Plan (NP). As you are aware, all Development Plan Documents in London, including neighbourhood plans must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraphs 184 and 29 of the National Planning Policy Frameworks (NPPF) 2012 and 2018, respectively also require neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the Harlesden Neighbourhood Area includes the London Plan and the Brent Local Plan. It must also give consideration to the Old Oak and Park Royal Opportunity Area Planning Framework and the emerging Old Oak and Park Royal Development Corporation (OPDC) Local Plan.

The Mayor has afforded me delegated authority to make detailed comments which are set out below and include representations from Transport for London (TfL), which the Mayor endorses.

**The draft new London Plan**

As you are aware, the Mayor published his Draft London Plan for consultation on 1<sup>st</sup> December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan will commence in January 2019 with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of the OPDC's, Brent's and the neighbourhood forum's Development Plan and contain the most up-to-date policies. The Harlesden Neighbourhood Plan is required to be in general conformity with the current London Plan, however any policies that diverge from the draft new London Plan will become out of date as the draft new London Plan gains more weight as it moves

towards publication. In addition, the Draft London Plan and its evidence base are now material considerations.

## **General**

The Mayor welcomes the overall approach to growth and development in the draft Harlesden Neighbourhood Plan. He considers that in general the plan is positive and clearly set out. However, the Mayor does have some concerns that a few approaches may act to restrict development across the neighbourhood planning area.

Neighbourhood planning provides communities the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years. It is about enabling rather than restricting development and a neighbourhood plan should show how it contributes towards sustainable development. Overly restrictive policies can prevent development and are contrary to the NPPF which has a presumption in favour of sustainable development.

The 2012 and 2018 NPPFs make clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. The neighbourhood plan area lies, primarily, within the London Borough of Brent, but overlaps with the London Boroughs of both Ealing and Hammersmith and Fulham. For planning purposes, the Harlesden Neighbourhood Area is also partially located within the Old Oak and Park Royal Development Corporation (OPDC) area. This is a significant strategic growth area for London and is recognised by the Mayor as an Opportunity Area in the London Plan and the OPDC Local Plan. The OPDC Local Plan will realise regeneration potential by setting out a clear and comprehensive strategy to optimise economic growth and regeneration potential, create a new town centre and bring many benefits for local and wider communities. Harlesden will capitalise on the benefits provided by this regeneration and the neighbourhood plan could do more to explore these opportunities. Table A1.1 (Town Centre Network) of the Draft London Plan identifies Harlesden as a strategic area for regeneration. As such this area should support and promote development which will contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area. Plans and policies should support development that contributes to the renewal of the town centre.

## **Sustainable Development**

The Mayor welcomes the aspiration of the draft Harlesden Neighbourhood Plan to promote sustainable development. Policy G1 – Sustainable Development, makes reference to Chapter 5 of the current London Plan. However, the neighbourhood plan should make reference to the more recent Draft new London Plan which will soon supersede the current one. This will ensure that the neighbourhood plan does not fall out of date quickly. Sustainable infrastructure is now contained in Chapter 9 of the Draft London Plan. With regards to sustainable development, the draft new London Plan designates Harlesden as a District centre with a low potential for commercial growth, but a high potential for residential growth.

## **Housing**

Policy H1 of the draft neighbourhood plan identifies four sites that are suitable for residential development and a further three potential development sites. However, the neighbourhood plan policy and the supporting site allocation text do not provide further clarity or detail, setting out the quantum and appropriate types of housing.



Draft Policy H2 – New housing density, refers to ‘the upper end of the density ranges’. This appears to refer to current London Plan Policy 3.4 which contains the sustainable residential quality (SRQ) density matrix. The new London Plan, once published, will not contain the SRQ density matrix but will seek to optimise density by evaluating an areas capacity (policies D1 and D2). It is therefore advised that any references to the density matrix in the neighbourhood plan be amended to take this into account. This will ensure that the neighbourhood plan does not quickly become out-of-date.

## Housing size

The London Plan (policy 3.8) encourages a range of housing choices. With regards to housing mix, the London SHMA 2017 (the latest evidence) identified the following need:

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

This has informed draft London Plan H12 which states for low cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs, but boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes. Such requirements are inflexible and can fail to meet the intended need, for example, family-sized homes often end up being occupied by sharing adults rather than families, and inflexible requirements can prevent otherwise suitable sites coming forward for residential development.

Paragraph 6.35 of the draft neighbourhood plan aligns itself with Brent’s Core Strategy by requiring 25% of new housing to be family sized (3 beds or more). However, this does not reflect the latest strategic evidence and is not in line with the Draft new London Plan (Policy H12). This prescriptive requirement should be amended to adopt a more flexible approach towards the delivery of larger sized dwellings.

Draft new London Plan small sites policy H2 seeks to optimise the delivery of housing on small sites in areas with PTALs 3-6 or within 800m of a tube station, rail station or town centre boundary. This policy has implications for the neighbourhood plan which does not take this strategic approach into account. Limiting building heights within the Harlesden Plaza area to four storeys would conflict with Policy 3.4 and 7.7 of the current London Plan and could potentially limit the Draft new London Plan’s presumption in favour of small housing development (Draft London Plan Policy H2) and would therefore restrict the ability of Brent to meeting its proposed housing target of 2,915 per annum including its small sites housing target of 1,023. Furthermore, restriction of development to this extent could stifle the viability of any future proposals and therefore have a negative impact on the neighbourhood plan’s ability to deliver its vision and good growth.



## **Community facilities and space**

Harlesden Plaza is identified as a location appropriate for the provision of new and enhanced community space. This is set out in proposed Policy CF1. The policy states that CIL funds could be used to finance this endeavour. While the Mayor welcomes the introduction of a diverse range of uses in town centres, in terms of making the best use of land, the co-location of community space with a range of other appropriate uses including commercial and where appropriate, residential should be promoted and supported.

At paragraph 7.6 a standard of 370m<sup>2</sup> per 1000 new population for community facilities has been referred to. While such standards can provide a broad benchmark for the provision of new facilities it fails to take into account existing latent provision in the wider local area. Nearby schools, sports facilities and other types of building may already have community space which is underused or is not currently accessible to the general public. The neighbourhood plan should investigate if similar opportunities exist in the locality, thereby freeing up space for other uses, including housing within the neighbourhood plan area.

## **Public Houses**

The Mayor welcomes and supports the neighbourhood plan's approach to identifying and nominating public houses as assets of community value.

## **Tall Buildings**

In order that local authorities are able to meet their housing targets taller (ie over four storeys) buildings will need to be considered more frequently as a potential solution in delivering the number of dwellings that London needs. The London Plan seeks to optimise development within town centres and at transport hubs, and in light of this the identification of Willesden Junction Station as an acceptable location for tall buildings is welcomed by the Mayor. However, the neighbourhood plan fails to consider the heights of buildings that will be delivered within the nearby OPDC area and Policy E9 – Tall Buildings, attempts to restrict the heights of buildings within the Harlesden Plaza site to a maximum of four storeys. The restriction of building heights in this area could restrict the viability of development proposals. The policy wording restricting building heights within Harlesden Plaza should be removed from and instead be replaced by a requirement that development proposals be sensitive and responsive to the surrounding environment and local context. Policy D8 Tall Buildings, in the Draft new London Plan and Policy 7.7 of the current London Plan should be followed and reflected in the neighbourhood plan.

## **Local Employment Sites**

Harlesden, as previously stated, suffers from low job densities and high unemployment. Between 2001 and 2015, 1,300 hectares of industrial land was transferred to other uses across London. This loss of industrial capacity comes at a time when demand for industrial capacity in the capital is increasing, mostly driven by strong demand for logistics to service growth in London's economy and population. The London Boroughs of Brent, Ealing and OPDC will experience increased demand for industrial capacity up to 2041 and have been identified in the draft new London Plan as boroughs that are required to provide additional industrial capacity.

In this respect it is considered that Policy LE1 – Local employment sites, could be strengthened to afford local employment sites greater protection against changes of use. Alternatively, mixed use proposals on these sites may be considered suitable where employment uses can be appropriately co-located with others such as residential in accordance with Policy E7 of the Draft London Plan. While most of the local employment sites are small they can provide much needed smaller, more affordable business spaces for a range of commercial uses and start-up businesses. Draft London Plan Policies E4 and E7 set out the approach to be taken in the release of any type of industrial land, noting that the already significant loss of industrial land in the area has resulted in Brent and the OPDC as being authorities that are to provide additional industrial capacity. In order to ensure conformity with the London Plan, neighbourhood plan Policy LE1 – Local Employment sites should be amended to reflect Policy E4 and E7 of the Draft London Plan.

## **Transport**

### **Bus garage**

#### **Community Aspiration 7 – Station Road land use and Paragraphs 8.21 and 9.8**

As stated above, the Mayor notes the Neighbourhood Forum's aspiration relating to the Willesden Junction bus garage site. He does not believe this aspiration can be realised within the Plan period as the site currently accommodates garage facilities which are essential to provide the local bus network. An explicit reference should be added to community aspiration 7 to explain the requirement (which is set out in the Mayor's Land for Industry and Transport SPG) that any suitable alternative site would need to result in no overall loss of garage capacity and be located in the immediately adjacent area. Alternatively, TfL would need to formally agree that the particular garage is no longer required which is not currently the case. As a result, these conditions are unlikely to be fulfilled.

The Mayor is pleased to note that the bus garage site is no longer included in the list of housing sites in policy H1 or the list of site allocations in chapter 11 and that in response to previous comments the references to removal of the current Strategic Industrial Land (SIL) designation have been deleted. However, there are still a number of negative references to the bus garage site and paragraphs 8.21 and 9.8 continue to seek the redevelopment and relocation of the bus garage on Station Road/Harley Road. The wording of these paragraphs are of serious concern to TfL and the Mayor would object strongly to any attempt to promote a redevelopment that involved any loss of bus garage capacity in the local area.

There are two interrelated issues raised – whether the bus garage site should be improved or redeveloped and whether the Strategic Industrial Land (SIL) designation should be changed. As acknowledged by the amended wording any alterations to SIL could only be progressed through the Local Plan process and could not be promoted by a Neighbourhood Plan. OPDC's revised draft Local Plan maintains the SIL designation and supports its continued use as a bus garage. The adopted London Plan provides protection for existing land used for transport or transport support functions in policy 6.2 requiring their identification and safeguarding through Development Plan Documents (DPDs). The Mayor's Land for Industry and Transport SPG provides further detail relevant to bus garages and states that:



*'The loss of any bus garage through redevelopment should be resisted unless a suitable alternative site that results in no overall loss of garage capacity can be found in the immediately adjacent area, or TfL agrees formally that the particular garage is no longer required.'*

Policy T3 in the draft London Plan also states clearly that:

*'Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by: 1) safeguarding existing land and buildings used for transport or support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary).'*

Although bus garages are mostly owned or leased by individual bus operators, TfL in its role as the strategic transport authority needs to ensure that there are sufficient and appropriately located bus garages to enable services to be provided efficiently. It is important to minimise the need for empty running from distant bus garages which adds to costs, congestion and emissions. The identification and protection provided for bus garages through DPDs, coupled with the designation of land used for a bus garage as SIL provide important safeguards against the loss of bus garages through redevelopment. The closure of any bus garage will have a negative impact on the bus network and competition in that area. Strategically this garage is well located and given its capacity for around 125 vehicles, Metroline operates 6 routes from here. The garage also supports employment in the Harlesden area and directly employs more than 450 staff (with an additional 20-30 contract roles). The garage is also the location of Metroline's Recruitment & Training Centre, covering their entire operation in London and providing facilities for all staff to gain access to further training and qualifications such as BTECs, NVQs and Driver CPCs. Recruitment of new drivers and supervisors also takes place here, as well as the site providing an Authorised Testing Facility which undertakes MOTs, following the closure of the DVSA testing station at Yeading.

The draft Neighbourhood Plan does not identify an alternative location for the garage if it were to be relocated. The statement of consultation suggests that the former Freight Liner terminal (also known as Willesden Euro Liner terminal) which will be used for construction purposes by HS2 Ltd could provide an alternative. However, this site would not be released by HS2 Ltd until 2026 at the earliest, and its designation as a strategic rail freight facility means that HS2 Ltd would be obliged to promote a future use that maximised the benefits of its direct rail connections.

Bus garages are extremely location sensitive, and even a slight relocation of a few hundred metres can significantly increase operating costs and emissions. It is not easy to find suitably located and configured land for bus garages, particularly where there is pressure for higher value development as in Old Oak and Park Royal. TfL will require evidence of early engagement with relevant parties including the operator (Metroline) to explore alternative options for the future improvement or redevelopment of the site. This should include retention of the bus garage as part of an enhancement or intensification of the existing operation rather than its wholesale relocation. It is important to note that the garage is currently leased from a third party rather than being owned by Metroline. If the operator were to consider a future relocation the following criteria for a replacement depot would need to be taken into account:

- The replacement garage can operate successfully in order to protect bus operations in this part of London
- The replacement garage will need to accommodate the existing fleet and the forecast one required to serve the area
- The location and design of the replacement garage within a fully mixed use development needs careful consideration in terms of the interaction of buses with pedestrians and cyclists entering the site

The process of exploring options for improvement or redevelopment of the existing site and any consideration of alternative sites will require liaison with all the relevant local planning and transport authorities as well as TfL.

### **Direct bus route**

#### **Community Aspiration 12 – Direct bus route and Paragraph 10.7**

TfL notes the Neighbourhood Forum's aspiration for a direct bus route from Harlesden through the proposed new High Street to the new (HS2/Elizabeth Line/Great Western) interchange station. This has previously been supported in principle by TfL pending the results of feasibility work. However Policy P2 – OON 14 in the revised draft OPDC Local Plan confirms that 'infrastructure studies for TfL and OPDC have shown that the delivery of the northern most section of Old Oak Street (the renamed High Street) across Harlesden Place to Willesden Junction is likely to be very challenging to deliver as an all modes route and at the time of the publication of this Local Plan, OPDC would support its delivery as a wide pedestrian and cycle only connection. This would not be capable of carrying buses over the rail tracks and so the OPDC Bus Strategy now proposes to connect Harlesden with the new station by changes to route 228 which would follow Old Oak Common Lane rather than using the High Street. Proposed phased changes to bus routes in the Old Oak area are outlined in detail in the OPDC Bus Strategy developed by TfL which was published alongside the Local Plan.

### **Roads and Traffic**

#### **Paragraphs 10.12 and 10.14**

It is noted that the Forum favours new links for vehicle traffic from Scrubs Lane to Old Oak Common Lane as part of redevelopment proposals in Old Oak. Whilst it is accepted that new routes could have some short-term beneficial impacts for traffic in Harlesden town centre, traffic modelling undertaken to date by TfL and OPDC has identified that creating new road links which are open as through routes for private vehicles is likely to cause issues elsewhere on the highway network, in particular on Old Oak Common Lane and Scrubs Lane and will draw more traffic into the area as a whole. As a result, the new links proposed in OPDC Local Plan are not designed as through routes for private vehicles and will provide access only. -



## **Car Parking**

Policy T2, Policy SA1 and Paragraph 10.17

The Mayor will support any proposed reduction in the amount of town centre car parking in order to promote access by more sustainable modes. Although justified by reference to current peak usage it is not clear why a minimum level of parking (60 spaces) should still be required after a redevelopment of the Harlesden Plaza site which could be more oriented towards access on foot, cycle or by public transport, consistent with the approach outlined in the Mayor's Transport Strategy and the draft new London Plan.

## **General**

Any specific policies or proposals in the submission version of the Neighbourhood Plan affecting transport assets, infrastructure or services that are owned or provided by TfL should be the subject of prior consultation. In particular any proposals for sites adjacent to or over rail tracks, stations or depots used by London Underground or Overground will need to demonstrate that there will be no adverse impact on transport operations.

## **Glossary of Terms**

The Mayor's preferred affordable housing tenures are not referred to in the definition of affordable housing in the neighbourhood plan's glossary. As these tenures will make up the greatest contribution in delivering affordable housing across London in the coming years it is advised that the neighbourhood plan includes these products (London Affordable Rent, London Living Rent and London Shared Ownership) in its definition of affordable housing. See paragraph 4.7.3 of the Draft London Plan and the Mayor's Homes for Londoners Affordable Homes Programme 2016-21.

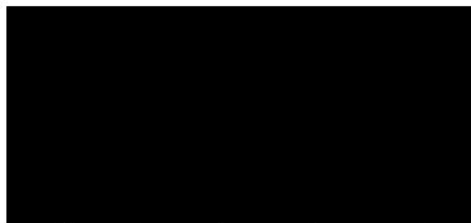
## **Maps / Images**

A more accurate image illustrating the precise boundary of the neighbourhood plan area would be advisable to avoid any disputes and issues regarding which land lies within and outside the boundary line. A link to Brent's interactive mapping system, showing the extent of the neighbourhood plan boundary line, should be provided in the neighbourhood plan document.

A couple of images illustrating site allocation boundaries could be clearer and more accurate. Location plans for Willesden Junction Station and Former Willesden Ambulance Station, for example, are not as clear as others in the neighbourhood plan. It is advised that these images be improved to avoid boundary issues.

I hope these comments inform the development of the Harlesden Neighbourhood Plan. If you have any specific questions regarding the comments in this letter please do not hesitate to contact [REDACTED] [REDACTED] on 020 7983 4000 or at [REDACTED]@london.gov.uk.

Yours sincerely



Cc Tony Devenish, Dr Onkar Sahota, Navin Shah London Assembly Constituency  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL

**From:** [REDACTED]  
**To:** [REDACTED] [@dpnf.org.uk](mailto:@dpnf.org.uk); [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
**Cc:** [REDACTED]  
**Subject:** RE: RE: Dartmouth Park Neighbourhood Plan – Regulation 16 Consultation  
**Date:** 03 May 2019 10:52:00  
**Attachments:** [FINAL - Dartmouth Park Neighbourhood Plan.pdf](#)

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Dear Sir/Madam

Thank you for consulting the Mayor of London on the Dartmouth Park Neighbourhood Plan (DPNP) (Regulation 16) consultation. As you are aware, all Development Plan Documents in London, including Neighbourhood Plans, must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 29 of the National Planning Policy Framework (NPPF) 2018 requires neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the Dartmouth Park Neighbourhood Area includes the London Plan and Camden's Local Plan.

The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have provided comments, which I endorse, and which are attached to this email.

The DPNP is in general conformity with the current and Draft New London Plan. This letter sets out where you may need to amend proposed policies and supporting text to be more in line with the current London Plan and the emerging Draft New London Plan.

### **The draft new London Plan**

The Mayor published his Draft London Plan for consultation on 1st December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan commenced on 15 January 2019 with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of Camden's Development Plan and contain the most up-to-date policies.

Given the anticipated timetable for the submission of the DPNP, it is likely that it will be required to be in general conformity with the new London Plan. In addition, the Draft New London Plan and its evidence base are now material considerations in planning decisions.

### **General**

Officers welcome the DPNP objectives listed at paragraph 2.4 including enhancing the predominantly residential character of the area and strengthening community cohesion; ambitions which build on the Mayor's Good Growth Policies, especially Policy GG1 Building strong and inclusive communities. In addition, Officers would like to see more proactive objectives that would help deliver much needed housing across the capital and within the London Borough of Camden in accordance with Good Growth Policy GG2 Making the best use of land. The Neighbourhood Plan should recognise that Camden's housing target has recently increased from 889 to 1,086 homes per annum and ideally the neighbourhood plan should establish how it will positively contribute towards this. A proactive approach would include site allocations (and not merely site identification) which the DPNP lacks. Four potential development sites have been identified and include future aspirations for the DPNP.

Officers also welcome the Neighbourhood Plan's identification of additional buildings of heritage importance which are not Statutorily Listed nor included in Camden's list of local heritage assets affording them a level of greater consideration in the planning process. This builds upon the

approach set out in paragraph 7.1.2 of the Draft New London Plan and is welcomed by the Mayor.

Officers recognise and welcome the inclusion of Policy DC4 which positively promotes residential extensions that respond to local context and enable residents to expand existing properties rather than having to move out of the area in search of more suitable accommodation. The policy should also support the development of extensions in appropriate circumstances where these allow the conversion of properties to form a larger number of dwellings which in turn would contribute towards meeting the borough's housing targets. The Neighbourhood Plan should consider where and how this type of development would be considered acceptable, especially in those areas where the presumption in favour of small housing development would apply in line with Draft New London Plan Policy H2.

Officers consider that references throughout the DPNP describing the area as 'semi-rural' are misleading and fail to recognise that while much of the area exhibits pockets that could be described as having 'leafy village feel', much of the area is characterised by fairly high-density development including purpose-built flats and post-war housing developments which give the area a much tighter urban grain. The DPNP should be amended accordingly.

25% of the Camden Community Infrastructure Levy (CIL) is available for local spending, predominantly by neighbourhood forums with adopted neighbourhood plans. The DPNP does not set out a list of local priority projects, potential costings and indicative timings. The forum is therefore advised to set out such a list of priority projects to be funded by the CIL receipts it receives in agreement with the London Borough of Camden. The use of neighbourhood funds should therefore match the priorities expressed and agreed by the local community and should be clearly set out in the neighbourhood plan. Failure to include such projects reinforces the overall negative approach adopted by the DPNP.

## **Housing**

Officers would support and welcome a neighbourhood housing apportionment figure which should be agreed with London Borough of Camden. The Neighbourhood Plan should proactively and positively set out how it will contribute towards delivering Camden's housing target now and throughout the plan period. The absence of such an approach means that the Neighbourhood Plan is not as positive and proactive as it might have been and does not actively promote Good Growth Policy GG2 of the Draft New London Plan.

The DPNP should recognise and reflect that the Mayor has strengthened his intention to secure on-site affordable housing in the Draft New London Plan and should take into account Draft New London Plan (showing minor suggested changes) Policy H5, paragraph 4.6.8A and paragraphs 4.5.5 – 4.5.8.

Officers welcome the DPNP's intention to maximise tenure integration in line with paragraph 3.4.5B of the Draft New London Plan (showing minor suggested changes). The DPNP should also promote the pepper-potting of affordable housing throughout a development to ensure maximum integration is achieved in accordance with the guidance set out in the Mayors Affordable Housing and Viability SPG (2017).

## **Neighbourhood Centres**

The DPNP should recognise that retailing and town centres across the country are experiencing change and challenges brought about by multi-channel shopping, changes in consumer behaviour and technology. In recognition of this, Policy CE1 should be flexible enough to enable the area's neighbourhood centres to adapt and diversify in order to maintain the integrity,



vitality and vibrancy of centres and avoid high numbers of vacancy. The DPNP should consider the full range of town centre uses beyond A1 as set out in the Glossary of the Draft New London Plan and should re-evaluate Policies CE1(a) and CE1(c) which are considered to be overly restrictive. The DPNP should follow the guidance set out in Draft New London Plan Policy SD6B.

Policy CE3 should ensure that accessibility is addressed and should also include the principles embodied in the Mayor's Healthy Streets Approach as mentioned earlier. The DPNP should follow the guidance and principles set out in Draft New London Plan Policies D7 and T2.

## **Transport**

Since the previous draft of the Neighbourhood Plan, a number of TfL's suggestions have been incorporated into this revised draft, which is welcomed. There are a number of references to, and policies and proposals within the Neighbourhood Plan which are consistent with the Healthy Streets approach identified within the Mayor's Transport Strategy (MTS) and the draft London Plan. A key element of the Healthy Streets approach is encouraging active travel, which in turn will support achieving the Mayor's target of 80 per cent of all journeys to be made by foot, cycle or public transport by 2041. Policies TS1 Safety and accessibility for pedestrians and cyclists and TS2 Cycling Improvements, which seek to improve the cycling environment within the Neighbourhood Area, will help to support achieving the aforementioned strategic aim. However, care should be given that any improvements are not to the detriment of other modes of sustainable and active transport, such as buses. TfL have provided a number of suggestions for the Neighbourhood Plan to further align it with draft London Plan policies and best practice, which have been appended to this letter.

## **Specific Neighbourhood Sites**

The DPNP identifies four potential development sites but states that these are not to be considered site allocations but are instead, aspirational, providing detailed suggestions how these sites could be developed. The Mayor's Good Growth Policy GG2 Making the best use of land (Draft New London Plan), encourages proactive approaches to the delivery of sustainable development and building on from this the DPNP should allocate three of its identified sites. Murphy's Yard should be excluded for the reasons set out below.

### **Murphy's Yard**

Murphy's Yard forms part of the Kentish Town Industry Area, the only designated Locally Significant Industrial Site (LSIS) in the borough. Both Camden's Local Plan and the Draft Kentish Town Development Framework (2018) seek the release of the southern Regis Road part of the site from its industrial designation and instead are designating and promoting it as a local Growth Area, which includes replacement industrial capacity. As such, Murphy's Yard still retains its LSIS designation and proposed future development on this site should be predominantly industrial in nature and apply the principle of no net loss of industrial floorspace capacity in accordance with Draft New London Plan Policy E4. Furthermore, the proposed release of the southern portion of the site from its industrial designation may result in Murphy's Yard having to accommodate an increase in industrial floorspace to off-set any loss of industrial floorspace experienced at Regis Road. The DPNP should recognise the above issues, acknowledge the complexity involved in bringing forward non-industrial uses on this site and note that this will form a considerable part of the emerging Kentish Town Planning Framework.

The proposed introduction of non-industrial uses here would need to ensure that they would not affect the ability of existing industry to function effectively in accordance with Draft New London Plan Policy E7. The Mayor would also expect to see servicing and logistics floorspace re-provided as well as floorspace supporting last mile distribution and other related service functions within

or close to the CAZ to support the needs of businesses and activities within these areas. For these reasons officers would advise that Murphy's Yard not be included as part of site suggestions/allocations within the DPNP

I hope these comments inform the development of the DPNP. If you have any specific questions regarding the comments in this letter please do not hesitate to contact [REDACTED] [REDACTED] on 020 7084 [REDACTED] or at [REDACTED] [london.gov.uk](https://www.london.gov.uk).

Regards

[REDACTED] [REDACTED]

**Senior Strategic Planner, London Plan Team**

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Monday – Friday, 9-10am until 4-6pm

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To Dartmouth Park Neighbourhood Forum,

## **RE: Dartmouth Park Neighbourhood Plan consultation draft**

Thank you for consulting Transport for London (TfL) on the draft Neighbourhood Plan. Please see the attached comments on behalf of TfL Spatial Planning. Our role is to look at growth and development in the statutory context of the London Plan on behalf of the Mayor of London.

The comments below summarise Transport for London (TfL's) views on the draft Neighbourhood Plan. Please note that these comments represent the views of TfL officers and are made on a "*without prejudice*" basis. They should not be taken to represent an indication of any subsequent Mayoral decision and they do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.

The draft London Plan, which was initially published on 29 November 2017, sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Following public consultation, the Mayor published a version of the draft Plan that includes minor suggested changes. The Examination in Public (EiP) of the draft London Plan opened in January 2019, with further suggested changes on policies being published as the EiP progresses. We are now expecting all new planning policy documents to give material consideration to the policies set out within the draft London Plan, noting that the decision-maker is to determine the balance of weight given to the adopted and draft policies.

TfL commented on a previous version of the draft Neighbourhood Plan in June 2018. It is welcomed that many of the TfL's suggestions from this consultation have been incorporated into this revised draft.

TfL would like to make the following General and Detailed Comments on the Neighbourhood Plan:

## General Comments

### *Healthy Streets*

It is noted that the document has been updated to include a number of references to the Healthy Streets approach, which is welcomed.

A key element of the Healthy Streets approach is encouraging active travel, which in turn will support achieving the Mayor's target of 80 per cent of all journeys to be made by foot, cycle or public transport by 2041.

TfL support policies which are aligned with this.

Generally, TfL is supportive of the policies and proposals put forward, as they are consistent with the Healthy Streets approach of the Mayor's Transport Strategy (MTS) and new draft London Plan.

### *Vision Zero*

The Mayor and TfL have also committed to delivering a 'Vision Zero' approach in London to make its streets safer for all, and eliminate all deaths and serious injuries from London's transport network by 2041. Minimising road danger is fundamental to the creation of streets where everyone feels safe walking, cycling and using public transport.

As a result we strongly support Policy TS1 and its aim to '*Make Dartmouth Park safer and more accessible for pedestrians and cyclists*'.

### *Buses*

Buses are key to delivering Healthy Streets and achieving strategic mode share targets. Operating within the Dartmouth Park Plan Area ('the Area') is routes C11, 4, 214 and 88. Since TfL's previous response, route C2 has been withdrawn and route 88 rerouted to run between Great Portland Street and Parliament Hill Fields.

TfL notes that the Plan has been updated to include references to maintaining bus journey times in Projects 13 and 14, which is welcomed. However, maintaining bus journey times is applicable to all road schemes, including cycling schemes. It is considered that it would be helpful if the document contained a more overarching reference to maintaining and improving bus journey times within the Transport chapter.

Finally, route 88 terminates at Parliament Hill Fields then circumnavigates the roundabout at Swains Lane and heads back down Highgate Hill. As a result it is essential this turn is maintained by any street works or public realm improvement projects in the neighbourhood area. In addition, proposed street works or public realm schemes which may impact on bus stands or bus stops within the area should be discussed, and agreed with TfL, at the earliest possible opportunity.



**Detailed Comments:***Issues and Opportunities*

TfL notes that since the previous draft, amendments have been made to the final bullet point of the 'Issues and Opportunities' section, which is welcomed. The second part of this objective could however lead to confusion, therefore it is recommended that the Neighbourhood Forum provide more clarity on what is meant by "*mitigating the transport and environment effects of a location on key routes into Central London*".

*Our Vision for Dartmouth Park*

TfL welcomes the reference to increasing the opportunities for '*pleasant and safe active travel*', and recognising its '*excellent connectivity*' within the Vision for the Plan.

*Our Objectives*

TfL welcomes the inclusion of a 'Transport and Streets' objective which seeks to ensure that the neighbourhood is well-connected to neighbouring areas and central London by walking, cycling and public transport links.

*Policy TS1 Safety and accessibility for pedestrians and cyclists*

Within TS1 (a), TfL recommends that the term 'continuous footways' be removed, and that this policy only apply to 'vehicle crossovers'. The reason being that 'vehicle crossovers' are recognised as part of the footway that vehicles may cross (Highways Act 1980, Sec 184), while continuous footways (in the form of a raised continuous treatment across a side road) currently have no comparable definition and are considered by TfL as a non-standard arrangement that requires local engagement and careful consideration before implementation.

TfL consider that TS1 (a) and (b) can be given additional clarity through updating the policy to identify the following design principle: '*Where new developments require a new access point(s) for motor vehicles, the visual continuity of the existing perimeter footways should be maintained where appropriate*'. The inclusion of this design principle will give recognition that a single approach to access points may not be appropriate in all instances (i.e. where traffic flows are expected to be relatively high) and that careful consideration of the design of the access should be made to ensure that the design is inclusive for all pedestrians.

TfL welcomes proposals to improve cycling infrastructure within the Area. The impact of all transport schemes needs to be considered across modes so it is recommended that as part of Policies TS1 and TS2, a reference to maintaining and improving bus journey times is included.

*Policy TS2 Cycling improvements*

As highlighted in the Mayor's Transport Strategy (MTS) enhancing the cycling environment is a key focus of the Healthy Streets approach, and provides the greatest immediate opportunity to reduce car use within Inner London areas. TfL therefore are generally supportive of Policy TS2.

TfL welcomes the reference to the London Cycling Design Standards (LCDS) included within the supporting text for Policy TS2.

The justification for TS2(c) largely focuses on the impact that improving cycling facilities can have on local air quality. Whilst TfL acknowledges the importance of the role that increasing cycling levels can play in addressing this issue, it would be useful to highlight how the implementation of this policy will also address other challenges facing London, such as high levels of congestion, low levels of physical activity, and public transport crowding, within this paragraph.

*Policy TS3 Traffic reduction*

We recommend considering the role that filtered permeability could potentially play in existing and new streets to reduce through motor vehicle traffic and improve conditions for walking and cycling.

TfL welcomes the requirement for non-residential development to provide electric vehicle charging points (ECVPs) to be installed to serve any new or replacement onsite parking. The amount of provision provided at these sites should accord with draft London Plan policies. TfL would welcome a reference within the supporting text for Policy TS3(c) which requires consideration to be given to the placement of the charging points, to ensure that they do not adversely impact on pedestrian comfort of the footways within the Area.

To support the anticipated switch to ultra-low emission vehicles, TfL would welcome a reference to increasing on-street provision of ECVPs in appropriate locations taking account of the need to coordinate with other street furniture.

*Policy CE3 Public Realm*

TfL welcomes the inclusion of this policy. Public realm improvements within the Area should be in line with the Healthy Streets approach, which will support achieving the Plan's vision in relation to active travel.

The reference to providing cycle parking, and the creation and maintaining of attractive well-signposted pedestrian routes is welcomed. However, TfL would like to raise some concerns in regards to the introduction of seating areas for cafes and restaurants on the pavements, and installing seating and recycling/rubbish facilities. The introduction of these and other street furniture etc. may be to a detriment to pedestrian and cyclist movement, and should therefore be considered carefully on a case by case basis when proposals come forward.

### *Chapter 3 Design and Character*

Within this chapter and its associated policies there are a number of references to the 'semi-rural' character/nature of the Area. TfL Spatial Planning would encourage the Forum and Council to consider defining Dartmouth Park as 'Urban' in the Neighbourhood Plan rather than 'semi-rural'. It is too centrally located within London to be reasonably considered 'semi-rural', especially as Kentish Town, which is defined as a District Centre in Annex 2 of the current London Plan and Table A1.1 of the draft London Plan, is located 800m to the south, and the Public Transport Access Level (PTAL) ranges from 3-6b in the vast majority of the Area.

#### *Policy DC1 Enhancing the sense of place*

DC1 (b) seeks to create additional green or open spaces in accordance with Camden's policies. TfL would recommend the inclusion of the term 'publically-accessible at all times' to ensure that all residents within the Area will be able to benefit from this additional space.

#### *Policy DC3 Requirements for Good Design*

TfL Spatial Planning is generally supportive of this policy, particularly subsection (g) which requires developments to provide appropriately sited and will integrated amenity space, refuse and recycling storage, cycling and mobility vehicle parking and delivery space to "*ensure a high quality and well managed streetscape*".

Urban Design and Transport are closely interlinked, with the design of a development, in particular that of its landscaping, having an impact on movement around/to the site. Such a link between the impact that the design of a development can have on movement is acknowledged within the draft London Plan (Policy D2 and Policy T2) and the Mayors Transport Strategy.

TfL recommend that the Plan acknowledges this link by mentioning walking, cycling and public transport in the Design and Transport policy sections, and the supporting text for Policy CE3.

#### *Policy ES2 Trees*

TfL welcomes the inclusion of this policy. Increasing tree coverage within the Area will be in line with draft London Plan policy, and will help to reduce the urban heat island effect and provide additional areas of shade, shelter and cooling. Similarly existing trees should be safeguarded from damage or removal as a result of development or project implementation.

*Appendix 5 – Projects*

The area does not contain Transport for London Road Network (TLRN) or Strategic Road Network (SRN) and changes to the highway are therefore mainly a matter for Camden Council.

TfL notes that within the supporting text for Project 13 and Project 14 that there are references to ensuring the changes to the road layout take into account the need to maintain or improve journey times. It is possible that these are not the only two projects that could impact on this, therefore TfL recommend that the Plan explicitly mentions that maintaining a strong easily accessible bus network is reliant on maintaining good bus journey times, and that proposals which result in the changes to road layouts to support cycling, walking and Healthy Streets should also maintain or improve bus journey times.

Whilst TfL do not object to the aspiration for improved pedestrian access at Gospel Oak Station, the improvements proposed are not part of TfL's current confirmed investment programme. Further discussions with Network Rail and TfL Rail on this aspiration would be required. Should the Neighbourhood Forum wish to progress these plans in the near future, work would need to be progressed through Third Party Funding.

A reference to possibly securing a contribution towards improving Pedestrian Access at Gospel Oak Station is included within Appendix 5. TfL would recommend that any contribution towards enhancing public transport secured from this site addresses the issues identified at the time of the application.

I hope you find these comments useful and take them into consideration. If you have any queries, or require further clarification, please do not hesitate to contact me.

Yours sincerely

  
**TfL Spatial Planning**

Email: @tfl.gov.uk

Direct line: 



**From:** [REDACTED]  
**To:** [REDACTED] <[\[REDACTED\]@camleystreet.org.uk](mailto:[REDACTED]@camleystreet.org.uk)>  
**Cc:** [REDACTED]  
**Subject:** GLA officer response - Camley Street Neighbourhood Plan Pre-submission  
**Date:** 13 January 2019 19:55:00

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Dear Sir/Madam

Thank you for consulting the Mayor of London on the Pre-Submission version of the Camley Street Neighbourhood Plan. As you are aware, all Development Plan Documents in London, including neighbourhood plans must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 29 of the National Planning Policy Frameworks (NPPF) 2018, also requires neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the Camley Street Neighbourhood Area includes the London Plan and the Camden Local Plan.

### **The draft new London Plan**

As you are aware, the Mayor published his Draft London Plan for consultation on 1<sup>st</sup> December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan will commence this week with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Camden and the neighbourhood forum's Development Plan and contain the most up-to-date policies. The Camley Street Neighbourhood Plan is required to be in general conformity with the current London Plan, however any policies that diverge from the draft new London Plan will become out of date as the draft new London Plan gains more weight as it moves towards publication. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Plan's reference to the published and draft new London Plan.

### **General**

Officers welcome the overall approach to growth and development in the draft Camley Street Neighbourhood Plan. In general it is considered that the plan is positively set out, however, there are some areas where policies could be set out more clearly and align more closely to the draft London Plan.

Neighbourhood planning provides communities the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years. It is about enabling rather than restricting development and a neighbourhood plan should show how it contributes towards sustainable development. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development.

Overall officers welcome the Vision and Core Objectives of the draft Plan.

### **Employment / Industrial Capacity**

The draft Plan places a strong emphasis on protecting and increasing employment floorspace, especially industrial floorspace. London, including the CAZ, depends on a wide range of

industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system.

Industrial land and floorspace provide the capacity for the activities described above to operate effectively. In 2015, London had an estimated 6,976 hectares of land in industrial and related uses of which about 36 per cent was in Non-Designated Industrial Sites, representing a significant contribution to London's economy. Over the period 2001 to 2015, more than 1,300 hectares of industrial land was released to other uses. This was well in excess of the London Plan monitoring benchmarks set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). In this regard, the draft new London Plan identifies Camden as a borough that should retain its industrial capacity.

Research indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041, mostly driven by strong demand for logistics, which tends to have a low on-site employment density, to service growth in London's economy and population. Given the limited amount of remaining industrial land close to central London, industrial areas like Cedar Way / Camley Street provide an important opportunity to provide industrial capacity to service the Central Activities Zone (CAZ). The priority should be for replacement/ additional industrial capacity that meets an identified need – such as industrial businesses, including logistics that service the CAZ. Draft London Plan policy E4 sets out appropriate industrial uses. It should be noted that some industrial employment uses to be re-provided such as logistics will have a low employment density.

Draft new London Plan policy E7 supports the redevelopment of non-designated industrial land where it meets the policy objectives. However, in this instance given the amount of industrial floorspace and the nature of the existing sites/buildings uses ie large warehouses, an area wide approach is needed to enable the intensification of the industrial capacity, and to retain the existing occupiers where required. It would be helpful for the Neighbourhood Plan to provide some indication of the opportunities to redevelop and intensify the industrial area and how this will be delivered. Further guidance is provided in draft London Plan policy E7 and the Mayor's Practice Note on Industrial intensification and co-location through plan-led and masterplan approaches ([https://www.london.gov.uk/sites/default/files/practice\\_note\\_-\\_industrial\\_intensification.pdf](https://www.london.gov.uk/sites/default/files/practice_note_-_industrial_intensification.pdf) ).

Once appropriate industrial floorspace has been reprovided, GLA officers would welcome wider employment uses including managed workspace that may fall within the B1a Use Class. The requirement that this affordable workspace is managed is welcomed. This should also ensure that the introduction of B1a floorspace does not encroach on existing /replacement industrial floorspace.

The final policies in the Neighbourhood Plan need to ensure that the requirement for low cost employment floorspace (both replacement industrial and workspace) is viable and doesn't undermine the intensification of industrial and employment uses.

## Housing

It would be helpful if the Neighbourhood Plan gave an indication of the number of homes likely to be delivered in the area. This should be done in conjunction with Camden Council, who, I understand are preparing a Site Allocations document. Consideration should also be given to the delivery of small housing developments in accordance with draft London Plan policy H2. In this regard, it is acknowledged that overall the borough of Camden has provided a good proportion of student housing. The best way to manage the mix of residential types could be through allocating the most appropriate residential uses on particularly sites, for example student housing.

## Affordable Housing

It is acknowledge that Camden's Local Plan has a 50% affordable housing target for schemes over 25 units, and the Mayor has set out a strategic affordable housing target of 50%. However, the Neighbourhood Plan should reflect the Mayor's threshold approach in line with his Affordable Housing and Viability SPG and draft London Plan policy H6. The starting threshold is 35% to be eligible for the fast track route, except where industrial capacity is lost or development is on public sector land - where 50% affordable housing provision is the threshold. This higher threshold reflects viability in that in general land values for industrial land are lower and the higher threshold also incentivises retention of industrial capacity. Where supported by local evidence, the Mayor will not object to a threshold above 35%. However, the lack of reference to the threshold approach is likely to be a point of non-conformity.

With regards to housing mix for the market housing element, the Neighbourhood Plan should ensure a flexible approach in line with draft London Plan H12. The provision of larger market units does not necessarily meet the needs of families given their cost and are instead occupied by sharers.

Given the potential mixes of uses, the Neighbourhood Plan should include the **Agent of Change principle** as set out in draft London Plan policy D12.

## Open space and Green Infrastructure

Officers welcome the requirements to provide new open spaces and enhance green infrastructure and biodiversity. The draft new London Plan seeks a net gain in biodiversity and includes a policy on urban greening.

I hope you have found these comments helpful to inform the next version of the Camley Street Neighbourhood Plan. If required, the Mayor will provide formal comments during the next round of consultation on the document. If you would like to discuss any comments in this letter please contact me at this email or on 020 7983 [REDACTED]

thanks

[REDACTED] [REDACTED]

Team Leader – Local Plans  
London Plan and Growth Strategies  
Development, Enterprise and Environment

**From:** [REDACTED]  
**To:** [REDACTED] [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)  
**Cc:** [REDACTED]  
**Subject:** RE: GLA officer response Redington and Frognal Neighbourhood Plan – Submission Version (Reg 16)  
**Date:** 27 August 2020 13:07:00

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Dear [REDACTED]

**Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Redington and Frognal Neighbourhood Plan – Submission Version (Reg 16) Consultation**

Thank you for consulting the Mayor of London on the Submission version of the Redington and Frognal Neighbourhood Plan (RFNP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2019, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Redington and Frognal Neighbourhood Area includes the London Plan and Camden's Local Plan.

**The Intend to Publish London Plan**

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish (ItP) version of the London Plan<sup>[1]</sup> was published on the 17 December 2019. Publication of the final version of the new London Plan is anticipated later in the year, at which point it will form part of Camden's Development Plan and contain the most up-to-date policies.

Given the timing, the neighbourhood plan must be in general conformity with the ItP London Plan. The ItP London Plan and its evidence base are now material considerations and officers welcome the RFNP's reference to both the ItP London Plan.

As currently drafted the RFNP is in general conformity with the current and emerging London Plans and the Officer's response below provides support and offers guidance that should be followed to improve the emerging neighbourhood plan and align it more closely with the ItP London Plan.

**General**

Officers welcome that the Neighbourhood Plan's aims are set out clearly early on at page six of the document and are largely consistent with the Mayors Good Growth objective GG1, Building strong and inclusive communities, as set out in the ItP London Plan by providing the local community the opportunity to shape growth in the area. The full extent of the neighbourhood boundary is set out on page 7, but the image could be clearer to make it easier to precisely identify which land lies within it. It would also be beneficial to illustrate how the neighbourhood boundary relates to the Redington Frognal Conservation Area which could be included in a map.

Up until now, preparation of the Redington and Frognal neighbourhood plan has taken more than six years. Since establishing the neighbourhood area in 2014, there have been numerous occasions of meaningful community engagement. This level of local involvement is welcomed and supported by officers and reflects the Mayor's Good Growth objective GG1 which encourages early and inclusive engagement with local communities.



## Local character and green spaces

The forum's intention to protect and enhance the character of the conservation area is supported and welcomed by officers. The neighbourhood plan demonstrates a clear understanding of the local historic environment and the heritage values of local sites and areas and their relationship with their surroundings. This approach is consistent with ItP London Plan Policy HC1.

The identification of locally important green spaces in draft Policy BGI 4 is supported by Officers and partly reflects the approach set out in Policy G4 of the ItP London Plan. Officers encourage the forum to identify clearly and easily those spaces which are currently publicly accessible and seek to ensure that these remain so when new development is proposed. This would be in accordance with other elements of Policy G4 of the ItP London Plan.

## Basement development

Officers welcome Draft Policy UD 1 of the RFNP which is consistent with the approach set out in the ItP London Plan Policy D10, instructing Development Plans to identify those areas where there are potential negative impacts from large-scale basement developments. The RFNP should note that the Mayor supports boroughs in restricting large-scale basement excavations under existing properties where this type of development is likely to cause unacceptable harm as set out at paragraph 3.10.3 of the ItP London Plan.

I hope you have found these comments helpful to inform the preparation of the Redington and Frognaal Neighbourhood Plan. If you would like to discuss any comments in this letter please contact, [REDACTED] [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](https://www.london.gov.uk).

Regards

[REDACTED]  
[REDACTED]  
Senior Strategic Planner  
London Plan Team  
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[1] [https://www.london.gov.uk/sites/default/files/intend\\_to\\_publish\\_-\\_tracked.pdf](https://www.london.gov.uk/sites/default/files/intend_to_publish_-_tracked.pdf)

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: GLA Officer's Response Redington and Frognal Neighbourhood Plan – Further Pre-submission (Reg 14) Consultation  
**Date:** 29 July 2019 14:06:00

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Dear [REDACTED]

Thank you for consulting the Mayor of London on the Further Pre-Submission version of the Redington and Frognal Neighbourhood Plan. As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2018, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Redington and Frognal Neighbourhood Area includes the London Plan and the Camden Local Plan.

### **The Draft New London Plan**

As you are aware, the Mayor published his Draft London Plan for consultation on 1st December 2017 and the Draft London Plan consolidated suggested changes (following examination hearings) on 16 July 2019. Publication of the final version is anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Camden and the neighbourhood forum's Development Plan and contain the most up-to-date policies. Given the timing, it is likely that the neighbourhood plan will need to be in general conformity with the new London Plan. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Plan's reference to the published and draft new London Plan.

### **General**

Officers welcome the overall approach to the preservation and enhancement of green spaces and biodiversity in the draft Redington and Frognal Draft Neighbourhood Plan. The Neighbourhood Forum set out their primary objectives from the outset, and this is welcome, underpinning the overall approach to the neighbourhood plan and builds on key components of the Mayor's Good Growth policies GG1 building strong and inclusive communities and GG3 creating a healthy city.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. While the officers consider that the Neighbourhood Plan would positively contribute towards environmental sustainability, it should help contribute more positively towards the implementation of Camden's Local Plan in meeting housing needs and the delivery of affordable housing.

The Neighbourhood Plan, at the very start, should include a map/maps, illustrating the entire extent of the Neighbourhood Plan and how it relates contextually to the wider area beyond its boundaries. It would also be useful if a map was included showing the distribution of proposed site aspirations.

### **Updated national planning guidance on neighbourhood planning**

Since the previous consultation on the Redington Frognal Neighbourhood Plan, in January 2019,

new updated national guidance on neighbourhood planning has been published and should be taken into account. The guidance reinforces some elements of our earlier response to the Redington Frognal Neighbourhood Plan especially with regard to setting a housing target for the area. New paragraphs 100-106 of the National Planning Guidance now set out information on housing requirement figures making it clear that an indicative housing requirement figure can be requested by a neighbourhood planning body based on local authorities local housing need as a starting point. If Camden Council are unable to provide a housing requirement figure or set out an indicative figure the Redington Frognal Neighbourhood Forum should instead use the [neighbourhood planning toolkit on housing needs assessment](#) for this purpose. Neighbourhood Plans are encouraged to meet or exceed housing requirements. A housing requirement figure would demonstrate a positive and proactive approach to neighbourhood planning and would be welcomed and supported by officers.

### **Housing and aspirational site identification**

The overarching objective of the current and Draft New London Plan and Camden's Local Plan is to deliver more homes that Londoner's need whilst protecting green space/MoL/GB and industrial land. Site allocations and neighbourhood plans that would prevent this from happening should be avoided at all costs. Camden's housing target as set out in Table 4.1 of the Draft New London Plan is for 1,086 new homes a year and the neighbourhood plan should set out how it will contribute towards achieving this. The Redington and Frognal Neighbourhood Plan should adopt a more proactive and positive approach towards development in the area in accordance with the Mayor's Good Growth policies GG2 and GG4 and Policy D6 of the Draft New London Plan which sets out guidance for optimising development should also be followed.

A neighbourhood plan such as this, which plans for the meagre delivery of only 35-39 new dwellings up to 2050, as set out in Table DS1 can only be considered to be negative and will not positively contribute towards Camden's or London's housing needs in the longer term. Officers encourage and support development positive site allocations that could realise potential uplifts in associated land values and provide certainty and clarity that are more likely to incentivise appropriate, sustainable and suitable development in the area and the associated benefits that this can bring.

### **Presumption in favour of small housing development**

The Draft New London Plan's presumption in favour of small housing development applies to small sites that fall within 800m of town centres and stations and in areas with a PTAL of between 3 and 6. For the neighbourhood plan this will include the Hampstead, West Hampstead and Swiss Cottage/Finchley Road town centres and Hampstead Underground Station and Finchley Road and Frognal Train Station. The neighbourhood plan should recognise that the presumption in favour of small housing development as set out in Draft New London Plan Policy H2 relates to different types of development including infill development, residential conversions and extensions, demolition and/or redevelopment of existing houses and/or ancillary buildings, infill development within the curtilage of a house and the redevelopment or upward extension of flats, non-residential buildings and residential garages to provide additional housing and should avoid policies that would prevent small sites development from coming forward

The neighbourhood plan presents an opportunity for the forum to develop suitable and appropriate residential design codes for small housing development types in appropriate locations within the neighbourhood area in accordance with Draft New London Plan Policy H2. Officers would also support the forum's intention to explore suitable small housing development in the area in order to contribute towards the delivery of Camden's small housing sites target of



376 new homes a year as set out in Table 4.2 of the Draft New London Plan.

### **Community infrastructure priorities**

Officers welcome the neighbourhood plans recognition that 25% of CIL receipts collected from development within the neighbourhood area will be given to the forum for the purposes of delivering the neighbourhood plan. The neighbourhood plan sets out in the broadest of terms its infrastructure priorities. However, it is considered that these priorities could be more detailed and area specific and should be agreed in collaboration with Camden Council and infrastructure providers such as TfL where necessary. The plan refers to Evidence Base document CF3 Community Infrastructure Priorities, but the infrastructure priorities should either be included in an appendix as part of the draft Neighbourhood Plan or made more clear and easily accessible on the website.

I hope you have found these comments helpful to inform the next version of the Redington and Frognal Neighbourhood Plan. If you would like to discuss any comments in this letter please contact me, [REDACTED] [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk).

Regards

[REDACTED] [REDACTED]

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E: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

T: 020 7084 [REDACTED] / M: [REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** GLA response  
**Date:** 23 January 2019 18:04:00

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Dear Sir/Madam

Thank you for consulting the Mayor of London on the Pre-Submission version of the Redington and Frognal Neighbourhood Plan. As you are aware, all Development Plan Documents in London, including neighbourhood plans must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 29 of the National Planning Policy Framework (NPPF) 2018, also requires neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the Redington and Frognal Neighbourhood Area includes the London Plan and the Camden Local Plan.

### **The draft new London Plan**

As you are aware, the Mayor published his Draft London Plan for consultation on 1<sup>st</sup> December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan will commence this week with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Camden and the neighbourhood forum's Development Plan and contain the most up-to-date policies. The Redington and Frognal Neighbourhood Plan is required to be in general conformity with the current London Plan, however any policies that diverge from the draft new London Plan will become out of date as the draft new London Plan gains more weight as it moves towards publication. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Plan's reference to the published and draft new London Plan.

### **General**

The Neighbourhood Forum set out their primary objectives from the outset, and this is welcome, underpinning the overall approach to the neighbourhood plan.

Neighbourhood planning provides communities the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should show how it contributes towards sustainable development. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. While it is considered that the Neighbourhood Plan would contribute somewhat towards sustainability, it could help contribute more positively towards the delivery of Camden's Local Plan and the London Plan.

The Neighbourhood Plan, should include a map/maps, illustrating the extent of the Neighbourhood Plan and how it relates to the wider area. It would also be useful if a map was included showing the distribution of proposed site allocations.

### **Housing**

GLA officers welcome that the Neighbourhood Plan identifies sites for housing development up to 2043. However, while the plan lacks a housing apportionment figure, arrived at in agreement with Camden Council, it does identify 11 sites with the potential to deliver between 37 and 45

new homes over that period. Camden's housing target as set out in the Draft New London Plan is for 1,086 new homes a year (376 homes from small sites) and in light of this the housing delivery set out in the neighbourhood plan would do little to contribute towards achieving this. Camden Council is working towards a Local Plan Site Allocations document and the neighbourhood forum should work with the Council to identify appropriate and suitable sites for the delivery of housing which would contribute towards the borough's housing needs and targets.

**Policy BD5: Infill and extension development.**

While the policy seeks to control infill and extension development there is the possibility that the approach could frustrate the presumption in favour of small housing development as set out in Draft New London Plan Policy H2. The policy should be amended to allow the presumption in favour of small housing development to operate where this is considered to be suitable and appropriate.

BD5 part iv sets a limit for the maximum land area allowable for the development of extensions to 15% of the unbuilt area or 50% of the entire plot, whichever is the least. While the 50% limit is in line with the Draft New London Plan Policy H2 the 15% limit is not and the policy should be amended to reflect the approach set out in the Draft New London Plan.

**Policy BGI1 Biodiverse Green Habitat and BGI3 Tree Planting and Preservation**

GLA officers welcome the Neighbourhood Plan's intention to prioritise green infrastructure and is in line with the Mayor's ambition to increase urban greening in London so that 50% of London is green and the capital's urban forest is increased by 10% by 2050. Where development proposals would result in the loss of a tree/trees replacement should be supported by the use of CAVAT or i-Tree Eco (or similar valuation tool) which considers the system benefits provided by the trees to be replaced. The Neighbourhood Plan should follow the guidance set out in Draft New London Plan Policy G7.

**Policy CF2 New Cultural, Leisure and Tertiary Education Facilities**

While we welcome the draft Plan's intention to promote and enhance culture in the area it restricts the provision of new facilities to music, ballet, art classes and tertiary courses such as those run by the University of the Third Age. The provision of new cultural uses should be broader and based on the needs of identified specific groups and uses in the local area, enhancing locally distinct cultural clusters. The Neighbourhood Plan should follow the guidance set out in Draft New London Plan Policy HC5.

**Community infrastructure priorities**

GLA officers welcome that Policy CF4 sets out the Plan's infrastructure priorities clearly. However, these priorities should be agreed in collaboration with the Council, taking into account draft new London Plan policy DF1, prior to the Neighbourhood Plan's publication.

I hope you have found these comments helpful to inform the next version of the Redington and Froggnal Neighbourhood Plan. If required, the Mayor will provide formal comments during the next round of consultation on the document. If you would like to discuss any comments in this letter please contact me, [REDACTED] [REDACTED] on 020 7983 4000 or at [REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

Thank you

[REDACTED]  
Principal Strategic Planner  
London Plan Team  
Development, Enterprise and Environment



## GREATER LONDON AUTHORITY

Planning Policy  
Regeneration and Planning  
London Borough of Camden  
Judd Street  
London WC1H 9JE

**Department: Planning**  
LDF06/LDD21/CG01  
Date: 25 October 2019

By email: [planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Dear Sir/Madam

**Re: Camley Street Neighbourhood Plan - Submission Version Regulation 16**

Thank you for consulting the Mayor of London on the Submission version of the Camley Street Neighbourhood Development Plan (CSNDP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2018, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Camley Street Neighbourhood Area includes the London Plan and the Camden Local Plan.

Overall, the Mayor considers the Camley Street Neighbourhood Development Plan is in general conformity with the current and emerging London Plans subject to the affordable housing policy fully aligning with the threshold approach in the draft new London Plan. The response below is guidance which should be followed to align the emerging neighbourhood plan more closely with the draft new London Plan.

**The Draft New London Plan**

As you are aware, the Mayor published his Draft London Plan for consultation on 1st December 2017 and the Draft London Plan consolidated suggested changes (following examination hearings) on 16 July 2019. The Panel Report has been published and the Mayor will publish his Intend to Publish version of the new London Plan within eight weeks. Publication of the final new London Plan is anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Camden and the neighbourhood forum's Development Plan and contain the most up-to-date policies. Given the timing, it is likely that the neighbourhood plan will need to be in general conformity with the new London Plan. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard the Mayor welcomes the draft Neighbourhood Plan's references to the new London Plans.

**General**

The Mayor welcomes the overall approach to growth and development in the draft CSNDP. In general, he considers that the plan is positively set out. However, there are some areas where policies should align more closely to the draft London Plan.

Neighbourhood planning provides communities the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years. It is about enabling development and a neighbourhood plan should show how it contributes towards sustainable development. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development.

The extent of the neighbourhood plan area is set out clearly at the very start of the document, and this is welcomed. Overall the Mayor welcomes the Vision and Core Objectives in Section 5 of the draft Plan.

## **Industrial land**

The draft Plan places a strong emphasis on protecting and increasing industrial floorspace. The Mayor strongly supports the CSNDP policies that seek to retain and intensify industrial uses and this is in line with draft new London Plan policy E4. London, including the Central Activities Zone (CAZ) depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system which can respond to business and consumer demands. Industrial land and floorspace provides the capacity for these activities to operate effectively. In 2015, London had an estimated 6,976 hectares of land in industrial and related uses of which about 36 per cent was in Non-Designated Industrial Sites which are not designated in Local Plan policies maps.

Over the period 2001 to 2015, more than 1,300 hectares of industrial land (including SILs, LSIS and Non-Designated Industrial Sites) was released to other uses. This was well in excess of previously established London Plan monitoring benchmarks set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). Research for the Greater London Authority (GLA), the London Industrial Land Demand Study 2017 (CAG), indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041, mostly driven by strong demand for logistics to service growth in London's economy and population. This has been recognised in the Panel Report.

Camden is in the 'retain capacity' industrial category as set out in Table 6.2 of the draft new London Plan. Plans should seek to intensify industrial floorspace capacity following the general principle of no net loss across designated SIL and LSIS. Camden is also located in the Central Services Area which means that there should be a focus on the provision of essential services to the (Central Activities Zone) CAZ and in particular, sustainable 'last mile' distribution/logistics, 'just in time' servicing, waste management and recycling and land to support transport functions and therefore B2 and B8 uses should be prioritised in line with draft new London Plan policies E4 and SD4M. The Camley Street Neighbourhood Area is located directly adjacent to the CAZ and therefore is well placed to serve the strategic servicing needs of London's core commercial area.

The Mayor would welcome a masterplan that clearly sets out how industrial capacity will be retained and intensified in line with draft new London Plan policies E4 and E7.

The Mayor would welcome an approach that ensures existing businesses that wish to, can remain in the Neighbourhood Forum Area.

### **Affordable workspace**

The Mayor welcomes the proposal to seek the provision of affordable workspace, in line with draft new London Plan policy E3. The Forum should ensure that the rate set and the land uses this applies to is viable to enable the delivery and intensification of industrial floorspace. B1 floorspace should be clearly defined into B1(a) and B1(c) as they serve a different need and are covered by different policy approaches in the draft new London Plan.

### **Offices**

Several policies in the draft neighbourhood plan refer to class B workspace. As stated above, B1(a) and B1(c) /B2/B8 uses serve a different need. Draft new London Plan policy E1 directs office B1(a) floorspace to the CAZ and town centres. However, given the site's location adjacent to the CAZ, the Mayor believes there is potential to make a case to support office use in the neighbourhood forum area. Any such approach should ensure B1(a) floorspace does not undermine the protection, retention and intensification of industrial floorspace in line with draft new London Plan policies E4, E7 and SD4M. Any office development should be supported by sustainable modes of travel.

### **Housing**

The Mayor welcomes the proactive approach to housing delivery. Subject to the protection of industrial capacity, the CSNDP should set out a clear housing target for the neighbourhood area. Such an approach will contribute to Camden's 10 year housing target of 10,860 homes as set out in draft new London Plan policy H1.

New updated national guidance on neighbourhood planning has been published recently and should be taken into account by the neighbourhood forum. New paragraphs 100-106 of the National Planning Guidance now set out information on housing requirement figures, making it clear that an indicative housing requirement figure can be requested by a neighbourhood planning body based on local authority's local housing need as a starting point. If Camden Council is unable to provide a housing requirement figure, or set out an indicative one, the Neighbourhood Forum should instead consider using the [neighbourhood planning toolkit on housing needs assessment](#) for this purpose.

The Mayor strongly welcomes the reference to Agent of Change principle in the supporting text, however to fully protect the ongoing operation of existing businesses and to protect new occupiers, he believes a clear reference to the Agent of Change should be included in the policy itself.

### **Affordable housing**

The Mayor welcomes the draft policy's move towards the Mayor's threshold approach. However, the approach to affordable housing needs to incentive developers to follow the fast track route by not requiring the submission of viability assessments. In addition, to incentive early delivery, the draft neighbourhood plan policy should require early and late stage reviews. Given the intricacies of the Mayor's affordable housing policy, he suggests simply referring to his draft new London Plan policy and Affordable Housing and Viability SPG and not including a policy in the neighbourhood plan.

## **Transport**

The Mayor welcomes the draft plan's focus on promoting walking and cycling. He also welcomes the aim to manage industrial traffic, but any approach needs to be tailored to each occupier to ensure the area remains attractive to a wide range of industrial occupiers. Any masterplan should clearly plan for industrial traffic. Given this is an industrial area on the edge of the CAZ, it has the potential to accommodate a consolidation centre itself.

## **Design**

The Mayor welcomes the approach that notes the wider built form and seeks to optimise development in line with draft new London Plan policies D1, D1B and D2.

The policies that require the preservation of historic assets and views are also supported along with the inclusion of the plan of the strategic views which shows the height thresholds and its reference in the draft Tall Buildings policy.

A reference to Agent of change should also be included in proposed policy CS DQ1 to ensure building designs protect new and existing occupants and businesses from pollution and disturbance.

## **Social infrastructure**

The Mayor welcomes the aims of the draft neighbourhood plan to provide social infrastructure. The CSNDP should set out a list of priorities to be provided either on-site by developments or through Community Infrastructure Levy (CIL) receipts.

## **Green Infrastructure**

The Mayor welcomes the requirements to protect and enhance existing open spaces in line with draft new London Plan policies G1 and G4, as well as the inclusion of an open space map.

The Mayor also welcomes the policy to create new green and open spaces as well as the requirement for new development to provide new open spaces and enhance green infrastructure and biodiversity. The draft new London Plan policy G6 seeks a net gain in biodiversity and includes a policy (G5) on urban greening.

Again, the CSNDP should set out a list of green infrastructure and open space priorities to be provided either on-site by developments or through Community Infrastructure Levy (CIL) receipts.

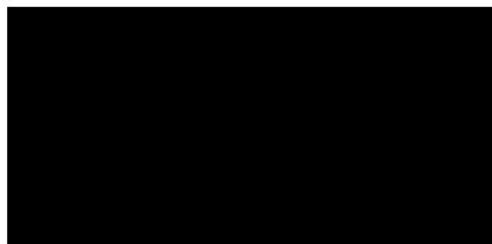
## **Glossary**

The Affordable housing definition should also refer to the Mayor's preferred affordable housing products for London which are based on current funding. These are set out in para 4.7.3 – 4.7.7 of the draft new London Plan.

I hope this can support and inform the Examination of the Camley Street Neighbourhood Development Plan. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact [REDACTED] [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](https://www.london.gov.uk) .



Yours sincerely



  
Chief Planner

Cc: Andrew Dismore, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
Lucinda Turner, TfL

# GREATER LONDON AUTHORITY

## Development, Enterprise and Environment

Strategic Planning & Implementation Manager  
Camden Council  
Town Hall  
Judd Street  
London  
WC1H 8ND

**Our ref:** LDF06/LDD14/CG01

**Date:** 28 January 2016

Dear [REDACTED]

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations  
2012**

**Re: Kentish Town Neighbourhood Development Plan 2015-2030 -  
Submission**

Thank you for consulting the Mayor of London on the Kentish Town Neighbourhood Development Plan 2015-2030 - Submission. As you are aware, all Local Development Plan Documents in London including neighbourhood plans have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 184 of the National Planning Policy Framework also requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. The Local Plan for the Kentish Town Neighbourhood Area includes all the Development Plan Documents (DPD) adopted by Camden Council and the London Plan. The Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London, which I endorse, will be sent separately.

The Kentish Town Neighbourhood Forum has responded to a number of matters raised during the earlier consultation stage and it is my opinion that the Kentish Town Neighbourhood Plan is in general conformity with the London Plan. However, I set out below some suggestions and other representations to clarify and improve policy areas.

**Kentish Town Industrial Area**

The amendments to draft policy SP2a - KTPDA - General Development Criteria that aim to improve the industrial floorspace across the site are welcome. As set out in the Mayor's previous correspondence, inner London industrial sites serve a particularly important function for London's economy by providing sustainable distribution services for the Central Activities Zone. Some of these industrial uses may have low employment densities but provide vital services which support other businesses in London, many of which will have significantly higher employment densities. Camden Council's Kentish Town Regis Road Growth Area Employment Study demonstrates that the proposed KTPDA provides such a function.

As stated in the Mayor's previous correspondence, the Camden Core Strategy currently identifies this area as the Kentish Town Industrial Area, which is a locally significant industrial site in terms of

the London Plan. Camden propose to amend the designation of part of this area to enable mixed use development, led by the re-provision of industrial floorspace. The Mayor has made representations to the borough to ensure that the priority for any redevelopment should be replacement, and where appropriate, improved industrial floorspace.

To ensure that industrial uses can be retained and potentially expanded, any new development will need to ensure that new occupiers and land uses will be able to operate alongside the operations of industrial uses that may require 24 hour servicing, potentially by heavy vehicles. Ideally any redevelopment would still provide a buffer between noisy industrial uses and more sensitive residential uses to ensure the long term viability of these essential industrial uses.

### **Murphy Site**

It is unclear what the status of this text is. It appears to propose a policy approach, but is not set out as a policy in the Neighbourhood Plan. The text should note that the current strategic and local evidence suggest that this site would still be required to provide industrial floorspace and therefore any redevelopment should provide industrial floorspace in line with an up to date industrial needs study. The approach set out in the Kentish Town Neighbourhood Plan could risk inflating land values based on unreasonable redevelopment expectations.

### **Energy**

The Neighbourhood Plan should reflect that for major development policy 5.2 of the London Plan includes an overall carbon dioxide reduction target of 40 per cent beyond Building Regulations 2013, moving to 'zero carbon' for residential development in 2016 and non-residential development in 2019. This target is supported by the evidence produced for the Minor Alterations to the London Plan. In line with the Mayor's energy hierarchy, the contribution that renewable energy technologies make to this target should only be considered after improved energy efficiency and the potential to establish or connect to a nearby decentralised energy network.

If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss and arrange a meeting.

Yours sincerely,



**Assistant Director – Planning**

cc     Andrew Dismore, London Assembly Constituency Member  
        Nicky Gavron, Chair of London Assembly Planning Committee  
        National Planning Casework Unit, DCLG  
        Alex Williams, TfL

## Development, Enterprise and Environment

**LB Ealing  
Planning Policy Team**

**Our ref:** LDF09/Neighbourhood/KR  
**Date:** 18/11/16

Sent by email to:  
[planpol@ealing.gov.uk](mailto:planpol@ealing.gov.uk)

Dear Sir/madam

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**Re: Central Ealing Neighbourhood Plan (submission draft)**

Thank you for consulting the Mayor of London on the Central Ealing Neighbourhood Plan regarding its general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Representations from Transport for London (TfL) are set out in Annex 1.

### **Strategic**

Central Ealing is a neighbourhood with good public transport connections, soon to be further enhanced with the opening of Crossrail. It also contains a metropolitan scale Town Centre. It is therefore an appropriate location for considerable development.

This is acknowledged within the “Densities” sub section under paragraph 4.8. This strategic context should appear earlier in the document. Instead there is a general tone of concern about the scale of new development that has recently been built, has planning permission or is under consideration. The Neighbourhood Plan should be amended to reflect this important contextual point.

### **Site Specific**

The proposed amendments to bus stops/stands and cycling provision, have previously been raised by TfL. The attached letter from TfL expands on the significant concerns about the relocation, and in particular that options have already been explored and found that the relocation of the bus facilities in particular are not practical or viable. This is due to there being inadequate space for bus turning and inadequate structural support for the area of land adjacent to the railway cutting. These are fundamental concerns which have not been addressed thus far and in TfL’s view are not likely to be overcome. **Therefore this aspect of the Neighbourhood Plan is seriously flawed and in its current form cannot be considered to be in conformity with the London Plan.**



A potential way around this may be to re-word the policy/action points to the effect that further work will be undertaken to explore options. However, as TfL point out, they do not see the preferred option as being likely to be viable.

If you would like to discuss any of the representations in more detail, please contact [REDACTED] (020 7983 4991) who will be happy to discuss any of the issues raised.

Yours sincerely,

[REDACTED]  
**Strategic Planning Manager**

cc Dr Onkar Sahota, London Assembly Constituency Member  
Tony Devenish, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL

**From:** [REDACTED]  
**To:** [REDACTED] [eeforum.org.uk](mailto:eeforum.org.uk)  
**Cc:** [REDACTED]  
**Subject:** FW: Lee Neighbourhood Development Plan - draft for consultation  
**Date:** 02 September 2019 10:13:00  
**Attachments:** [Lee Neighbourhood Development Plan - TfL officer response.pdf](#)

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Dear Sir/Madam

Please find a response on behalf of the GLA and TfL that was sent to the Forum on Friday.

Thank you

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 30 August 2019 23:50  
**To:** [REDACTED] [eeforum.co.uk](mailto:eeforum.co.uk)  
**Subject:** Lee Neighbourhood Development Plan - draft for consultation

Dear Sir/Madam

Thank you for consulting the Mayor of London on the Lee Neighbourhood Development Plan – draft for consultation. It would be helpful if future consultations were sent to [planningsupport@london.gov.uk](mailto:planningsupport@london.gov.uk) as well as Transport for London (TfL). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2018, makes it a requirement that neighbourhood plans within London be in general conformity with the London Plan. The Development Plan for the Lee Neighbourhood Area includes the London Plan, the Greenwich Local Plan and the Lewisham Local Plan.

### **The Draft New London Plan**

As you are aware, the Mayor published his Draft new London Plan for consultation on 1st December 2017 and the Draft London Plan consolidated suggested changes (following examination hearings) on 16 July 2019. Publication of the final version is anticipated in Winter 2019/20. Once published, the new London Plan will form part of Greenwich and Lewisham's as well as the neighbourhood forum's Development Plan and contain the most up-to-date policies. Given the timing, it is likely that the neighbourhood plan will need to be in general conformity with the new London Plan. In addition, the Draft new London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Neighbourhood Plan's reference to the published and draft new London Plans. It should be noted that in addition to the strategic GG policies noted in the draft Neighbourhood Plan, the draft new London Plan also contained detailed land use policies.

The Lee Neighbourhood Development Plan is considered to be in general conformity with the current and emerging London Plans and the officer's response below is guidance which should be followed to improve the emerging neighbourhood plan and align it more closely with the draft new London Plan.

### **General**

The extent of the neighbourhood plan area is set out clearly and precisely at the very start and this is welcomed by officers. Officers welcome the acknowledgement of the wider role the neighbourhood area can play in the region. In this regard the support for the Lee town centre as a District centre is welcome. The role and viability of this centre could be enhanced

through the introduction of residential development. Annex 1 of the draft new London Plan notes Lee Green town centre has a low potential for commercial growth but a medium potential for residential growth.

The overarching spatial principles are made clear at the beginning of each chapter of the document, and this clarity is also welcome.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it positively contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. While officers consider that the Neighbourhood Plan would positively contribute towards achieving some elements of sustainable development, it should help contribute more positively and proactively towards the implementation of the emerging London Plan in meeting housing needs. A positive and proactive approach is considered to be one which recognises and reflects the boroughs' annual housing targets and sets out how it will contribute towards achieving it.

New updated national guidance on neighbourhood planning has been published recently and should be taken into account. New paragraphs 100-106 of the National Planning Guidance now set out information on housing requirement figures, making it clear that an indicative housing requirement figure can be requested by a neighbourhood planning body based on local authority's local housing need as a starting point. If Greenwich and Lewisham Councils are unable to provide a housing requirement figure, or set out an indicative one, the Neighbourhood Forum should instead use the [neighbourhood planning toolkit on housing needs assessment](#) for this purpose. Neighbourhood Plans are encouraged to meet or exceed identified housing requirements.

### **Retail and Local Economy**

Officers welcome the draft Plan's support of its town centres and employment areas. The Plan could encourage residential development within its town centres where this does not affect the vitality of the centre. Officers welcome the proactive Recommended further actions set out in the draft Plan.

In this regard, in conjunction with the borough, it should be considered whether the industrial areas should be referred to as Locally Significant Industrial Sites in line with draft London Plan policy E6. Draft London Plan policy E4 seeks to ensure no net loss of London's industrial capacity to enable London to continue to function. Industrial areas should not only be protected for their employment capacity but to ensure there is a wide range of industrial, logistics and related uses that are essential to the functioning of London's economy and for servicing the needs of its growing population.

In this regard the neighbourhood plan policy should ensure no net loss of industrial capacity in the forum's designated Local Employment Locations as detailed in Table 1. This should also be reflected in any site allocation containing industrial uses.

This section should refer to the Agent of Change principle as set out in draft London Plan policy D12.

### **Heritage and Design**

Officers welcome the Neighbourhood Plan's identification of additional buildings of heritage importance which are not Statutorily Listed nor included in Greenwich or Lewisham's list of local heritage assets, affording them a level of greater consideration in the planning process. This builds upon the approach set out in paragraph 7.1.2 of the Draft New London Plan and

is welcomed by officers.

As per the town centres, this section should also support design codes to facilitate the delivery of small housing sites within the Forum Area.

### **Green and blue spaces**

Officers welcome the protection and support for the enhancement of green and blue spaces and biodiversity across the forum area. The specific measures identified for enhancement could be identified as priorities for the expenditure of Community Infrastructure Levy funds.

### **Community Infrastructure**

Officers welcome the audit of existing community infrastructure across the forum area, and the support for their retention, where appropriate. The policies should support the sharing of new and existing facilities by community groups, where possible. Again, the specific measures identified for enhancement could be identified as priorities for the expenditure of Community Infrastructure Levy funds.

### **Transport**

Please see TfL's comments attached.

### **Housing**

The overarching objective of the current and Draft New London Plan is to deliver the homes that Londoner's need whilst protecting land uses such as green space/MoL, employment and industrial land. Greenwich and Lewisham's housing targets of 3,204 and 2,117 per annum, respectively are set out in Table 4.1 of the Draft New London Plan. The inclusion of Site Allocations for housing development is welcome but the Lee Neighbourhood Development Plan should build on the area based on guidance in line with the Mayor's Good Growth policies GG2 and GG4 and Policy D6 of the Draft New London Plan.

Officers welcome the draft Plan's proposal to adopt the London Plan's approach to affordable housing.

### **Other matters**

It should be noted that the Mayor of London prepares the London Plan and not the London Assembly. There is also relevant evidence on the London Plan's EiP web-site, especially regarding housing, industrial demand and town centres. Documents can be found here <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan/eip-library>

I hope you have found these comments helpful to inform the next version of the Lee Neighbourhood Development Plan. If you would like to discuss any comments in this letter please contact me, [REDACTED] [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

[REDACTED] [REDACTED]

### **Team Leader – Local Plans**

#### **London Plan and Growth Strategies Team**


GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]

[london.gov.uk](https://www.london.gov.uk)



TfL reference: CBRO/19/3  
By email: @leeforum.co.uk

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[www.tfl.gov.uk](http://www.tfl.gov.uk)

To Lee Neighbourhood Forum,

## RE: Lee Neighbourhood Development Plan

Thank you for consulting Transport for London's Spatial Planning team on the draft Lee Neighbourhood Development Plan (hereafter referred to as the Plan). Our role is to consider the strategic transport aspects of growth and development in the statutory context of the London Plan and on behalf of the Mayor of London.

The comments below summarise our views on the Plan. Please note these comments represent the views of TfL Spatial Planning officers (only) and are made on a "*without prejudice*" basis. They should also not be taken to represent an indication of any subsequent Mayoral decision and they do not necessarily represent the views of the Greater London Authority (GLA).

The latest version of the draft London Plan – Consolidated Suggested Changes version was published in July 2019 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. TfL expects all current planning proposals to consider the policies set out within this document, noting that the decision-maker is to determine the balance of weight to be given to adopted and draft policies.

### Neighbourhood Area Context

The strategic transport context of the Neighbourhood Plan Area (hereafter referred to as the Area) includes:

- A20 Lee High Road, A2213 Sidcup Road and A205 Westthorne Avenue, all of which form part of the Transport for London Road Network (TLRN). A20 Lee High Road runs east to west across the plan area. A2213 Sidcup Road forms part of the eastern boundary of the plan area. A205 Westthorne Avenue (the South Circular) forms the southern boundary of the plan area. The remainder of the public highways in the area are the responsibility of the Royal Borough of Greenwich or Lewisham Council.

- two National Rail stations, Hither Green and Lee. These are serviced by Southeastern rail services. Lewisham and Blackheath stations are both within reasonable ( PTAL) walking distance of parts of the neighbourhood
- bus routes: 122, 178, 180, 202, 261, 273, 321, 621, B16, N21. There are additional bus services just outside the area, notably In Lewisham town centre
- part of the local cycling network (LCN+) on A20 Lee High Road. There are a number of Greenways that run through the Plan area.

In consequence of the above public transport provision most of the neighbourhood has a PTAL of 3 with the rest ranging between 1a, 1b, 2 and 4.

In addition there are the following proposals: introduction of a Quietway between Woolwich to Lee Green, subject to feasibility designs, of which part will fall within the Area.

## **General Comments**

### **Healthy Streets**

TfL welcomes the explicit reference to the Mayor's Healthy Streets approach in Policy TC2 and section 4.4.5. We have adopted the Healthy Streets Approach to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business. We encourage the use of the Healthy Streets diagram (Appendix A) to further support the policies set out in the Plan.

There is a Healthy Street Neighbourhood Scheme (HN) proposed by London Borough of Lewisham called 'Lewisham and Lee Green HN', which encompasses the majority of the Neighbourhood Plan area. The HN scheme proposed applies TfL's Liveable Neighbourhoods concept to the local area. The council are looking to use their Local Implementation Plan (LIP) funding to support this scheme. Key aims of the scheme are to reduce rat running through the area, reduce collisions and to encourage more walking and cycling. These aims align with those identified within the Plan, and therefore the Neighbourhood Forum (referred to hereafter as the Forum) should ensure that their plan aligns with the HN scheme.

### **Basic Conditions Statement**

The Basic Conditions Statement has not been provided for review. As highlighted in National Planning Practice Guidance (NPPG), "a statement (a basic conditions statement) setting out how a draft neighbourhood plan or Order meets the basic conditions must accompany the draft neighbourhood plan or Order when it is submitted to the local planning authority".

### Vision Zero

The Mayor and TfL have committed to delivering a 'Vision Zero' approach in London to make streets safer and seek to eliminate death on London's transport networks. We strongly encourage reflecting the Mayor of London's Vision Zero approach to eliminating all deaths and serious injuries on the road network by 2041 in the Plan's strategic spatial principles, and spatial vision should one come forward. It is neither inevitable nor acceptable that anyone should be killed or seriously injured when travelling in London, and embedding the Vision Zero action plan into local policy will reduce road danger for everyone and create safe streets for walking and cycling

The Forum should be aware that delivering Vision Zero policies and practices is likely to impact on some of the proposals identified within the Plan, which includes, but not limited to, providing improvements to key junctions, road crossings and key routes (Policy TC3 (1)), improving pedestrian crossings (Policy TC3 (2)) and providing small traffic islands to reduce the width of the roadway (Policy TC3 (3)). The Lewisham HN scheme will contribute towards achievement of the Vision Zero approach, a further reason for ensuring alignment of the Neighbourhood Plan with the this scheme.

### The draft London Plan

Throughout the document there are references to the London Plan. These references should be updated to ensure that they are referring to the latest version of the draft London Plan, which was published in July 2019 as Consolidated Suggested Changes. This is available to view on the following link: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-london-plan-consolidated-suggested-changes-version-july-2019>. However it is expected that the final version of the revised London Plan will be published/adopted early in 2020 and thus you should consider referencing policies in the current London Plan or similar wording to give your document longevity in wording.

The document also uses quoted text from the draft London Plan which will need to be updated to reflect the latest version. From TfL's review of the document quoted text from the London Plan will need to be updated on the following pages:

Page Number	Draft London Plan policy
51	GG 1D
67	GG 2C
79	GG 2D, GG 3E
93	GG 1B

Page Number	Draft London Plan policy
102	GG 1C
110	GG 1E, GG 3D

### Buses

Buses are key to delivering Healthy Streets and achieving strategic mode share targets. Ten day and/or night bus routes operate within the Lee Neighbourhood Plan area and there are others serving stops nearby. The draft Neighbourhood Plan contains policies and further actions which would result in amendments being made to the highway network. It would be useful if the Plan was updated to include a reference which recognise that an accessible bus network is reliant on maintaining good bus journey times, and that any changes to road layouts, such as through the creation of traffic islands and improving key junctions, should not adversely impact bus operations, and should maintain or improve journey times. All highway changes should also at least maintain if not improve existing bus stops and stands within the area and in particular that they meet current TfL standards and guidance as set out in Accessible Bus Stop guidance and any further subsequent guidance.

### TfL Green Assets

There are a number of trees within the Area, including TfL trees located on Lee High Road, Eltham Road and Westthorne Avenue. As highlighted in the draft London Plan and the Mayor's Transport Strategy 2018 (MTS) there are multiple benefits associated with green infrastructure which includes improved resilience to severe weather and climate change, better air and water quality, the encouragement of walking and cycling, and enhanced biodiversity. In light of this, every effort must be made to protect existing green infrastructure – where a loss can be justified as unavoidable, new green infrastructure should be provided in order to deliver a net gain in biodiversity (as measured by CAVAT value).

Any works involving or impacting TfL trees will need to be agreed with TfL, this includes, inter alia, felling, lopping, pruning, excavation.

### Bakerloo Line Extension

As you will be aware TfL are developing proposals for the extension of the Bakerloo Line to Lewisham and potentially beyond. We would suggest that in finalising the Plan the aforementioned is taken into account. We plan to consult again on the scheme this Autumn.



## **Detailed Comments**

### **Spatial Vision for the Lee Forum Area**

The Plan states that 'The spatial vision for the Lee Forum area is underpinned by the following key spatial principles'. It appears that no spatial vision has been included within the Plan. It is strongly recommended that the Plan is updated to clearly show the spatial vision for the Area. TfL Spatial Planning would encourage references to the Healthy Streets approach and Vision Zero to be included within the vision.

### **Strategic Spatial Principles – Spatial Principle 1: Green Infrastructure-led development**

TfL welcomes the inclusion in the Plan of improving opportunities for active travel such as walking and cycling in the Forum area as this will support achieving the Mayor's strategic target of 80 per cent of journeys within London to be made by walking, cycling or public transport by 2041. As identified in the draft London Plan Figure 10.1A, there is a higher target for inner and central London.

It is useful to highlight that green infrastructure led development is not the only way in which the Area can improve opportunities for active travel, and that the creation of high quality public realm and creative urban design at new developments can also support an uptake in active travel modes. In light of this, TfL Spatial Planning would suggest that the Plan refer to supporting an increase in active travel modes through high quality urban design within their Heritage and Design chapter, with references included within the strategic aim, objectives and policy HD2. It is also recommended that the Recommended Further Actions of the Heritage and Design Chapter also include a reference to the Healthy Streets approach.

### **Strategic Spatial Principles – Spatial Principle 3: Accessible and connected social-cultural nodes of retail and social activity**

TfL welcomes the principle of creating a healthier public realm on routes that link to retail nodes. The Forum are strongly encouraged to identify the creation of healthier public realm to public transport nodes within or close to the area and also consider other elements which an Active Travel Zone assessment would include such as schools, health facilities, sports provision and open spaces. Further guidance on how to carry out an Active Travel Zone assessment can be found using the following link: <http://content.tfl.gov.uk/atz-assessment-instructions.pdf>

The creation of a healthier public realm aligns with the principles of the Mayor's Healthy Street approach. TfL Spatial Planning would therefore recommend that a reference to the Healthy Streets is included within this strategic spatial principle.

### **Policy R3 Improve and Enhance the Public Realm of Retail/Cultural Activity Sites**

TfL are generally supportive of policy R3 which seeks improvements to the public realm that prioritises the movement of pedestrians and cyclists which aligns with the Mayor's Healthy Streets approach detailed in draft London Plan policy T2. It is recommended that the policy is revised to include a reference to the Healthy Streets approach.

### **Policy GB4 Protection and Increase of Tree Cover**

TfL welcomes the inclusion of this policy. Increasing tree coverage within the Area will be in line with draft London Plan policy, and will help reduce the urban heat island effect and provide additional areas of shade, shelter and cooling. Similarly existing trees should be safeguarded from damage or removal as a result of development or project implementation.

### **Transport and Connectivity – Strengths, Weaknesses and Opportunities**

The reference to instilling Healthy Streets initiatives into new developments is strongly supported and in line with the draft London Plan and the Mayor's Transport Strategy.

### **Chapter 5 – Transport and Connectivity**

#### **Strategic Aim**

The focus of the strategic aim to: improve air quality, improve road safety, improve the vibrancy of our streetscapes and encourage active travel in and around the Lee Forum area, is supported by TfL and generally in line with the Mayor's Transport Strategy and the policy approach contained within the draft London Plan.

All of the aforementioned improvements form part of the Mayor's Healthy Streets approach, which is detailed in draft London Plan policy T2. In light of this and to further align this policy with the current policy direction, it is recommended that this aim includes an explicit reference to delivering the Healthy Streets approach within the Area.

In addition, TfL would welcome a reference to Vision Zero being included within Objective 5 to align the aim with Policy 3 of the MTS and draft London Plan policy T2.

#### **Objectives**

In general, TfL welcomes the inclusion of transport objectives which seek to improve public transport accessibility, improving the walking and cycling environment, improve road safety and reduce car dominance within the Area.

It is noted that the Neighbourhood Plan includes an objective to 'Reduce the number of motor vehicle journeys on roads within the Lee Forum area'. This is welcomed and in line with the strategic policy direction. It is useful to highlight that the MTS requires boroughs to produce traffic reduction strategies, and the Forum should consider what role the Neighbourhood Plan can play in achieving this.

However, it is considered that objective four, which seeks to 'Reduce the pressure of on-street parking spaces for residents and visitors to the neighbourhood' would benefit from further clarification as it is unclear what mitigation measures will be put in place to achieve this. It is useful to highlight that TfL would not support an increase in parking provision within the area, as it would be contrary to draft London Plan policy T2 which seeks to reduce car dominance on London's streets.

#### 4.5 Identification and Mapping

Three sections of Lee High Road have been identified as 'Street Improvement Zones'. TfL would welcome further clarity on the type of improvements that the Forum seeks to implement in the identified zones. As highlighted above, Lee High Road forms part of the Transport for London Road Network (TLRN), therefore any works including to the footways will need to be approved by TfL.

Any improvements to the public realm or highway generally within the Neighbourhood area should be in accordance with the Healthy Streets approach and prioritise walking and cycling movement, in line with draft London Plan policies and the Mayor's Transport Strategy. As noted above in respect of Lee High Road any works to the public highway on Sidcup Road and Westhorpe Avenue will need to be approved by TfL. For other public highway the approval of the relevant local highway authority will be required.

#### Existing Policies

The Forum should update the reference to the draft London Plan to reflect the updated version.

In addition to the Good Growth Policies, the policies in Chapter 10 (Transport) of the draft London Plan will also guide development, particularly those relating to the Healthy Streets Approach and Vision Zero.

#### **Policy TC1 Protect, Promote and Enhance Public Transport Connections**

Policy TC1(A) includes a reference to Public Transport Accessibility Level. This term is incorrect and should instead be Public Transport Access Level (PTAL). TfL would recommend that this point is expanded to include proposals that improve access to public transport more generally, for example through the creation of new routes to improve permeability, or that enhance existing walking and cycling routes that will help to increase public transport access in the area (as well as active travel).

TfL welcome the Forum's further encouragement of sustainable transport in Part C. We ask that this is extended to all forms of sustainable travel – walking, cycling and public transport – to support achieving the Mayor's strategic mode share targets. The Forum may wish to consider cycle hire and Legible London to support the delivery of this policy. It is also suggested that this policy is strengthened by explicitly discouraging non-sustainable travel in all new developments. This could be achieved through the implementation of controlled parking zones (CPZ's) and permit free schemes.

### **Policy TC2 Improve Measures to Tackle Pollution Levels**

In general, TfL is supportive of the policy TC2 which seeks to ensure that developments within the Area make a positive contribution to improving air quality and reduce noise pollution.

The reference to the Mayor's Healthy Streets Approach in Policy TC2 (A(6)) is welcomed. A (1) of the policy seeks to maximise the contribution that the public realm makes to encouraging active travel. This is central to the Mayor's Healthy Streets Approach as detailed in draft London plan policy T2. To further align this policy with the strategic direction, the Forum may wish to consider including a reference to the Healthy Streets approach.

A (2) seeks to encourage a reduction in the use of private vehicles, which is supported and in line with the draft London Plan. This does however conflict with TC3(5) which seeks to improve parking for shops, which can be seen to be encouraging the continued use of a private car. To support A(2), it is recommended that TC3(5) is removed, or further clarification of the intention behind Part 5 of this policy provided. People should be encouraged and enabled to access shops by walking, cycling or public transport. TfL do not support increasing the provision of car parking in well connected areas. Car parking should be restricted and not exceed draft London Plan **maximum** standards. All development schemes that come forward within the Area must comply with draft London Plan standards for disabled parking, as set out in Policy T6.

The Forum should identify 'strategic neighbourhood routes' that are being referred to in A(3).

Sections B states that all residential homes should be within 500m of safe and secure cycle storage and electric vehicle charging points. Whilst this principle is supported the Forum may wish to consider whether a more ambitious target can be set – 500m is more than a 5 minute walk and this may be too far to encourage any significant mode shift. In any case all new development should ensure that the provision of cycle parking is at least in line with the draft London Plan minimum standards, and designed in accordance with the London Cycling Design Standards (LCDS). Provision of electric vehicle charging points should be in line with draft London Plan policy T6.



### **Policy TC3 Improve Road and Traffic Safety Measures**

In general, TfL supports the Neighbourhood Plan's policy seeking improvement to road safety. This is in line with the Mayor's Vision Zero approach. The details of specific proposals will be crucial to the successful implementation of this policy. As noted above, any improvements to the TLRN will need to be approved by TfL. Early engagement with TfL on this is essential. A similar point applies to borough highway.

TfL would welcome the identification of 'key junctions, road crossings and key routes' and the pedestrian crossings which are referred to within this policy.

Clarification should be provided on what is meant by the term 'strategic walking route'.

#### **5.5.7. Recommended Further Actions**

The Transport chapter of the Neighbourhood Plan contains a number of further actions on which the Forum would have to work with TfL. These actions, and TfL's response can be found in the below table.

<b>Recommended Further Action</b>	<b>TfL's Response</b>
Improve the Positioning of Bus Stops	Any proposed relocation/re-positioning of bus stops within the Neighbourhood Plan area will need to be agreed with TfL. The repositioning of any bus stop should seek to maximise the accessibility of the bus network to existing and potential passengers and should be designed to protect and enhance the reliability of the network. Furthermore it is essential that passenger facilities at any relocated or re-positioned bus stop match if not improve upon existing and that the infrastructure meets TfL's current standards and guidance as set out already above.
Create Bus Lanes on the A102 Blackwall Tunnel Approach that could provide much quicker access to and from North Greenwich (5.2km in approximately 10-12 minutes) using a bus route that also serves Lee Green	TfL assess all proposals that could improve bus reliability along our network and the associated costs and benefits and funding. In terms of this particular proposed action, modelling would be required and also consideration of the changes proposed in North Greenwich consequent upon continuing development and the Silvertown Tunnel. Bus services especially those going across the Thames, are intended to be enhanced as part of the Silvertown Tunnel

Recommended Further Action	TfL's Response
	<p>project. Plans for these will develop closer to the opening of the tunnel and key stakeholders will be engaged as part of this process.</p> <p>However, opportunities for bus priority beyond the approach to the Silvertown Tunnel also needs to be prioritised in the Plan and funding opportunities identified. Bus priority results in a more reliable bus network, reduces journey times, which in turn increases demand for bus services, justifying increases to capacity and frequency on the network.</p>
Improve Bus Frequency	<p>TfL would like to increase bus capacity and frequency across London as this will support achieving the Mayor's strategic target of 80 per cent of all journeys within London to be made by walking, cycling or public transport by 2041. Where this increase in demand for bus use, is driven by development then we would expect developer contributions ( s106) towards the costs of necessary mitigation. In other circumstances we keep under review the changing needs of bus passengers and the mode shift targets and seek to , improve capacity, frequency and reliability in line with the Mayor's Transport Strategy (Proposal 90) and the draft London Plan where funding is available and in relation to priorities.</p> <p>It would be helpful if the Plan identified which of the ten routes in the area and those just outside but serving the Area the Forum would prioritise for improvement and the reasons for this choice.</p>
Provide a faster direct train service for connection to the Elizabeth Line at Abbey Wood from Hither Green and Lee by increasing the speed of already timetabled	<p>TfL notes that trains between the Area and Abbey Wood are operated by South Eastern as part of the National Rail service. Therefore this proposal should be discussed with them and with Network Rail.</p>

Recommended Further Action	TfL's Response
services via Slade Green	
Encourage the cycle docking stations network used in central London to expand to Lewisham	<p>TfL would support in principle extension of the Santander Cycle Hire scheme to the Area. However, we have no funding identified for this expansion and there will need to be a considerable number of docking stations installed further west and north to bridge the gap between the boundary of the existing network in Southwark (and the Isle of Dogs) and Lee.</p>
Address the safety, traffic and speed issues in the Lee Forum Area, working with the London Borough of Lewisham and Royal Borough of Greenwich	<p>As highlighted above, the Mayor and TfL have committed to delivering a 'Vision Zero' approach in London to make streets safer.</p> <p>TfL would welcome further engagement with the Forum on this matter. Consideration should be given as to the installation of temporary/short-term measures for trialling interventions that could support achieving this action.</p> <p>The Forum may wish to review TfL's 'Small Change, Big Impact – A practical guide to changing London's public spaces' which can be accessed from the following link:  <a href="http://content.tfl.gov.uk/small-change-big-impact.pdf">http://content.tfl.gov.uk/small-change-big-impact.pdf</a></p> <p>In any circumstance the Forum should include in their table reference to working with TfL as well as the boroughs give that TfL is the highway authority for the TLRN within the area.</p> <p>Funding opportunities should be identified at an early stage for these works to enable delivery. TfL does not have any identified contribution which could be made available.</p>
Work with the local community to develop proposals for Lee High Road and Lee Green Crossroads, including improved pedestrian environment, safe crossings and	<p>In general, TfL is supportive of improvements to the public realm. Any improvements to the public realm should be in line with the Healthy Streets approach identified within draft London Plan policy T2.</p>

Recommended Further Action	TfL's Response
environmental enhancements	<p>As highlighted above, TfL is the highway authority for Lee High Road therefore any improvements will need to be agreed with TfL. TfL would welcome further discussion.</p> <p>It should be noted that TfL has no funding currently for these works and thus a key part of any project development would be to identify funding sources such as Neighbourhood CIL and LIPS.</p>

### **Site Allocations**

TfL notes that site allocations 7 and 8 contain building height restrictions of 4 storeys. The draft London Plan focuses on ensuring that Good Growth occurs within London. This includes directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling network. The adoption of this approach will not only support achieving the Mayor's strategic target of 80 per cent of all journeys to be made by walking, cycling and public transport by 2041, but will also enable the creation of vibrant and active places. Policy SD6 of the draft London Plan also promotes higher-density renewal in town centre sites. In light of the above, the Forum is encouraged to remove building height restrictions from their proposed site allocations.

TfL request that the site allocation for Site 7 (Sainsbury's Site) and Site 8 (Site at 321-341 Lee High Road) are revised to ensure that the current vehicular access remains unchanged or alternatively commit to design and modelling work to demonstrate that any development that may come forward on this site will not have a detrimental impact on the safety and function of the TLRN. Furthermore, this measure will also support the creation of active frontages along Lee High Road, which is in line with the Mayor's Healthy Streets approach.

It is noted that the redevelopment of Lee Gate has been identified as an opportunity within section 4.4.1. of the Neighbourhood Plan, however no site allocation for this site has been provided. As a result, it is unclear what type of redevelopment/regeneration the Forum considers to be appropriate. As part of a recent planning application (18/107468) for this site, TfL raised concerns with the impact the proposed development would have on TfL assets such as the TLRN and TfL trees. Any site allocation that comes forward for this site should include details on how it will address TfL concerns raised in the most recent

application, and give consideration to the aspirations and policies set out in the draft London Plan and the MTS.

I hope you find these comments useful and take them into consideration. If you have any queries, or require further clarification, please do not hesitate to contact me.

Yours sincerely

  
**TfL Spatial Planning**  
Email: @tfl.gov.uk  




**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Public Consultation on proposed Highgate Neighbourhood Forum and Neighbourhood Area  
**Date:** 24 September 2012 10:56:42  
**Attachments:** [image001.gif](#)

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Dear [REDACTED],

Thank you for consulting the GLA on the proposed Highgate Neighbourhood Forum and Neighbourhood Area.

At this stage I can confirm that the GLA has no specific comments to make. I would be grateful, however, if you could keep us informed of the development of the Neighbourhood Forum, and ensure the GLA is consulted on any subsequent draft Neighbourhood Plan.

Kind regards,

[REDACTED]

[REDACTED] | Strategic Planner | Planning Decisions Unit | Development & Environment  
**GREATER LONDON AUTHORITY** | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA  
[REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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**From:** [REDACTED]@haringey.gov.uk]  
**Sent:** 20 September 2012 10:38  
**Subject:** Public Consultation on proposed Highgate Neighbourhood Forum and Neighbourhood Area

Dear Consultee,

**Neighbourhood Planning in Highgate**  
**Notice of receipt of applications for a Neighbourhood Forum and Neighbourhood Area in Highgate**

A Highgate community group has applied to Haringey and Camden Councils to be formally designated as a **neighbourhood forum** and to set the boundary of their **neighbourhood area**, in accordance with Neighbourhood Planning Regulations 2012.

Both Councils are now seeking views and comments on the applications from residents and other interested stakeholders. The consultation begins on the 20<sup>th</sup> September and all responses must be submitted by **Friday 2<sup>nd</sup> November 2012**.

The applications show the area in which the group intends to use the new neighbourhood planning powers, and the Forum who propose to write a Neighbourhood Plan arising from the Localism Act and the supporting neighbourhood planning regulations. Representations should consider whether the neighbourhood area and the neighbourhood forum are appropriate to be designated.

The applications are available to view at River Park House (6<sup>th</sup> Floor), Wood Green, N22 8HQ, the Civic Centre, High Road, Wood Green, N22 8LE, between 9am and 5pm, local libraries and online at [www.haringey.gov.uk/neighbourhood\\_planning](http://www.haringey.gov.uk/neighbourhood_planning) or [www.camden.gov.uk/neighbourhoodplanning](http://www.camden.gov.uk/neighbourhoodplanning)

Responses should be made by email to [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk) or in writing to LDF Team, London Borough of Haringey, River Park House (6<sup>th</sup> Floor), Wood Green, N22 8HQ.

Please note this consultation does not relate to a neighbourhood plan.

For further details please contact the LDF team at 020 8489 1479 or email [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

Yours sincerely,



Team Leader Planning Policy

**| Planning Policy Officer**

**Planning Policy and Development**

**London Borough of Haringey**

6th Floor, River Park House

Wood Green

London, N22 8HQ

Tel:

email: [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

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**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

Kennington Oval & Vauxhall Forum

Sent by email to: [REDACTED]@gmail.com

**Our ref:** LDF22/CG01

**Date:** 09 May 2018

Dear Sir/Madam,

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations  
2012**

**RE: Kennington Oval & Vauxhall Forum - Draft Neighbourhood Plan  
(Regulation 14) Consultation**

Thank you for consulting the Mayor of London on the draft Kennington Oval & Vauxhall (KOV) Neighbourhood Plan (NP). As you are aware, all Development Plan Documents in London, including neighbourhood plans must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 184 of the National Planning Policy Framework (NPPF) also requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. The Development Plan for the Kennington Oval & Vauxhall Neighbourhood Area includes the London Plan and the Lambeth Local Plan.

The Mayor has afforded me delegated authority to make detailed comments which are set out below and include representations from Transport for London (TfL), which I endorse. TfL's detailed comments are attached as Annex 1.

**The draft new London Plan**

As you are aware, the Mayor published his draft London Plan for consultation on 1<sup>st</sup> December 2017. It is anticipated the Examination in Public of the draft London Plan will take place in the Winter 2018 with publication in Autumn 2019. Once published, the new London Plan will form part of Lambeth's and the neighbourhood forum's Development Plan and contain the most up-to-date policies. The KOVNP is required to be in general conformity with the current London Plan, however any policies that diverge from the draft new London Plan will become out of date as the draft new London Plan gains more weight as it moves towards publication. In addition, the draft London Plan and its evidence base are now material considerations in planning decisions.

**General**

Neighbourhood planning provides communities the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years. It is about enabling rather than restricting development and a neighbourhood plan should show how it contributes towards sustainable development. Overly restrictive policies can prevent

development and are contrary to the NPPF which has a presumption in favour of sustainable development (paragraph 14).

The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. The Kennington Oval & Vauxhall Neighbourhood Area is located partly within the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area (OA) and the Central Activities Zone (CAZ). The current and draft London Plans identify the CAZ as having a significant office function as well as other strategic and residential development. The draft new London Plan identifies the part of the Southbank in Lambeth as an area of international or national significance for the night time economy, with a medium potential for commercial growth and the potential for incremental residential growth. Vauxhall is identified as being a CAZ retail cluster with a night time economy of regional or sub-regional significance and a high potential for both commercial and residential growth. It is also an area of strategic regeneration.

It is considered that the KOVNP could go further in setting a clear positive vision for promoting growth in the Plan area, distinguishing between the higher growth and commercial activity of the OA and the CAZ, and the wider plan area to help meet the strategic needs of both the Lambeth Local Plan and the London Plan. In this regard, the OAPF and Site Allocations in the Lambeth Local Plan indicate buildings in the region of 150m may be appropriate in this part of the OA. Proposed Important Local View b may conflict with this framework as Site 13 in Lambeth Local Plan which is located within the OA potentially extends into this view.

## **Housing**

The draft new London Plan sets Lambeth a marginally higher revised 10-year net housing completions target of 15,890 units (1,589 per annum). Of this target, 6,540 completions should be identified from small sites (below 0.25 hectares). The KOVP should meet a proportion of the overall and small sites housing target.

The draft new NPPF states that strategic plans should set out a housing requirement figure for designated neighbourhood areas. Alternatively, the neighbourhood planning body can request a figure. The draft NPPF is anticipated to be published before the summer recess and therefore come into effect by the end of the year for the purpose of examining plans – see paragraph 208 of the draft new NPPF.

## **Oval Gas Holder Site**

The Montford Place – Beefeater/Oval Gasworks is designated as a Key Industrial and Business Area in the Lambeth Local Plan. London Plan policy 4.4 seeks to maintain an appropriate supply of industrial land across London. Lambeth is identified as a borough with a restricted opportunity for the release of industrial land.

The draft new London Plan proposes a more restrictive approach to the release of industrial land and emphasises the need to intensify industrial activities due to the much greater release



of industrial land than is stipulated in the London Plan monitoring benchmarks. Lambeth remains a borough that should retain its industrial capacity.

Whilst proposed policy KOV12 seeks to increase the amount of employment on the site, the detailed policies seek the residential led re-development of the site, most likely altering the nature of the current employment floorspace. Paragraph 6.4.5 of the draft new London Plan states that the 'no net loss' of industrial floorspace capacity does not apply to sites used previously for utilities infrastructure and Lambeth's Local Plan Regulation 18 consultation put forward the option of de-designating part of the site. In addition, a planning application has been made for a large part of the site. The Forum should review the borough's latest evidence and assess whether the borough has sufficient employment capacity, in particular for industry, logistics and services within B1c, B2 and B8 uses to support London's economic function as set out in draft London Plan policy E4A.

## **Transport**

TfL welcomes the opportunity to input at the drafting stage, particularly given it has numerous assets and services in the Neighbourhood Area such as bus routes, stops and shelters, cycle hire docking stations, long stretches of the Transport for London Road Network (TLRN) and London Underground stations.

The NP will help facilitate and deliver the Mayor's transport policies at the neighbourhood scale. On this point, although the draft NP has good policies on mode shift away from private vehicles, promoting walking and cycling etc, there should be more explicit, and more references to the Healthy Streets Approach, for example the policy is only cited in respect of air quality (page 27) when it is much more than just this.

Similarly, 'Good Growth' principles could be embedded throughout the NP – this is only currently mentioned in respect of the Oval and Kennington Development Area (OAKDA) on page 48, although this is of course a key development site in the KOV area.

With regards to the Vauxhall Gyratory (page 6 of the draft Plan), which is part of the TLRN, TfL is working closely with Lambeth Council to re-introduce the safer two-way road system - which was supported in public consultation<sup>1</sup>. The current bus station was created for the one-way road system so needs to be completely redesigned to allow buses to operate. These changes will enable us to create not only safer roads, but also new public spaces and improved cycle lanes and pedestrian facilities and more efficient bus routes, with the aim of helping to improve connectivity and create a better environment for people living, working and travelling through Vauxhall.

## **Green spaces**

The Mayor strongly supports the protection of existing green and open spaces, however, the Forum should note the strict criteria the NPPF (paragraph 77 and 101 of the draft NPPF)

<sup>1</sup> Between 24 November 2015 and 17 January 2016, TfL ran a consultation on detailed proposals for changes to Vauxhall Cross. We received 1,247 responses to the consultation. The overall responses show that 61 per cent were generally positive towards the proposals.



requires are met to support the designation of spaces as Local Green Space. This is highlighted by an Inspector's decision to delete the local green space designation from Croydon's Local Plan<sup>2</sup>. Designations should still provide flexibility across a site to enable housing delivery, where appropriate.

## Environment

The Mayor welcomes the proposed policies to improve the local environment, particularly air quality.

I hope these comments inform the development of the KOVNP. If you have any specific questions regarding the comments in this letter please do not hesitate to contact [REDACTED] on 020 7983 [REDACTED] or at [REDACTED]@london.gov.uk.

Yours sincerely



Chief Planner

Cc Florence Eshalomi, London Assembly Constituency  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL

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<sup>2</sup> Paragraphs 225 – 243

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/inspector%E2%80%99s%20Report%20on%20the%20Croydon%20Local%20Plan.pdf>

## Annex 1 - TfL comments

### Covering text

Thank you for consulting TfL on the draft Kennington Oval Vauxhall (KOV) Neighbourhood Plan (NP). TfL welcomes the opportunity to input at the drafting stage, particularly given it has numerous assets and services in the Neighbourhood Area such as bus routes, stops and shelters, cycle hire docking stations, long stretches of the Transport for London Road Network (TLRN) and London Underground stations.

The NP will help facilitate and deliver the Mayor's transport policies at the neighbourhood scale. On this point, although the draft NP has good policies on mode shift away from private vehicles, promoting walking and cycling etc, there should be more explicit, and more references to the Healthy Streets Approach, for example the policy is only cited in respect of air quality (page 27) when it is much more than just this.

Similarly, 'Good Growth' principles could be embedded throughout the NP – this is only currently mentioned in respect of the Oval and Kennington Development Area (OAKDA) on page 48, although this is of course a key development site in the KOV area.

With regards to the Vauxhall Gyratory (page 6 of the draft Plan), which is part of the TLRN, TfL is working closely with Lambeth Council to re-introduce the safer two-way road system – which was supported in public consultation<sup>3</sup>. The current bus station was created for the one-way road system so needs to be completely redesigned to allow buses to operate. These changes will enable us to create not only safer roads, but also new public spaces and improved cycle lanes and pedestrian facilities and more efficient bus routes, with the aim of helping to improve connectivity and create a better environment for people living, working and travelling through Vauxhall.

### Detailed comments on policies

Policy	Page	Relevant KOVNP text	Comment	Draft London Plan (DLP)/Mayors Transport Strategy (MTS) policy/proposals
KOV3 GREENING OF OUR STREETS	30	This KOV Neighbourhood Plan strongly supports new additional tree planting in streets and the greening of for instance footpath verges,	The busiest roads with consequently the poorest air quality (as shown on Figure 13) are generally TfL roads, part of the Transport for London Road Network	MTS Policy 2 – improving street environments (Healthy Streets Approach)

<sup>3</sup> Between 24 November 2015 and 17 January 2016, TfL ran a consultation on detailed proposals for changes to Vauxhall Cross. We received 1,247 responses to the consultation. The overall responses show that 61 per cent were generally positive towards the proposals.

		bus stops, walls and structures in the streets of the Neighbourhood Area. A priority must be given to our busy and congested streets with consistent poor air quality and noise pollution	<p>(TLRN). TfL supports further tree planting along these roads, following the principle of 'right tree, right place'; approval would be required from TfL as Highway Authority. Funding through the local CIL receipts should be secured to deliver this.</p> <p>Bus stops, more specifically shelters, are TfL assets, and therefore any proposals affecting them would need TfL approval. TfL needs more information on the nature of the proposed greening, to assess impacts on passengers and maintenance. Funding needs to be secured through the local CIL receipts.</p>	<p>MTS Proposal 43 – increase street tree numbers</p> <p>DLP Policy G1 (Green Infrastructure) DLP Policy G5 (Urban Greening) DLP Policy T2 (Healthy Streets)</p>
KOV8 CONNECTING OUR HIGH STREET: KENNINGTON CROSS TO KENNINGTON PARK ROAD	39	This Neighbourhood Plan supports the improvement and growth of retail, service, leisure, recreation, office, community and other appropriate uses leading to increased local employment in Kennington Cross, Kennington Road and the junction with Kennington Park Road.	<p>This policy should specify the requirement for new development fronting the TLRN to provide off-street, or suitable alternative, servicing. This is in line with LB Lambeth and London Plan policy.</p> <p>The roads mentioned in KOV8 are busy corridors with high traffic, bus, cycle and pedestrian flows. On-street and/or poorly managed servicing can adversely impact on road safety and increase congestion, affecting bus journey times. This in turn undermines other objectives of the KOV NP.</p>	<p>DLP Policy T2 (Healthy Streets) DLP Policy T7 (Freight and servicing)</p>
Paragraph 2.76 Oval	48	2.76 In 2018, Oval House will be moving to its new	The following additional line/paragraph should be	DLP Policy T4 (Assessing and

House Theatre and Montgomery Hall		home in Brixton as part of the Somerleyton Road Project. Policy KOV 13 requires the retention of the current level of public community (part of D1 and D2 use classes for social, cultural and community use). This is light of local need and expected population growth in our neighbourhood.	<p>added to/after paragraph 2.76:</p> <p>‘Any redevelopment of the site should consider road safety, and that of cyclists in particular, as this is a busy cycle corridor linking to segregated cycle route CS4 across Vauxhall Bridge’.</p> <p>The site is on a bend and experiences very high cycle flows, particularly in the morning peak hours, as it is a key cycle route across the Thames from south and south east London. Site access and servicing arrangements will need to be carefully considered, should this site be redeveloped.</p>	mitigating transport impacts)
KOV15 Better Basements   All Buildings	61	<p>b) proposals are to demonstrate how they safeguard the structural stability of the existing building, nearby buildings and other infrastructures including London Underground tunnels and the highway</p> <p>l) ensure that traffic and construction activity do not cause unacceptable harm to pedestrian, cycle, vehicular and road safety; adversely affect bus or other transport operations (e.g. cycle hire), significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living,</p>	<p>TfL welcomes the specific policy support requiring consideration of TfL assets – London Underground tunnels and the TLRN.</p> <p>Although it mentions ‘inconvenience’, part l) it should also specifically mention the need to maintain pedestrian movement on the highway i.e. that the footway must not be obstructed.</p>	<p>DLP Policy T2 (Healthy Streets)</p> <p>DLP Policy T4 (Assessing and mitigating transport impacts)</p>

		working and visiting nearby;		
Community Priority Projects	65	Greening of bus stops, green roofs, street tree planting and living walls.	<p>As per comment above (and subject to the caveats mentioned), this is strongly supported and would be an ideal use of local CIL receipts.</p> <p>More generally, the KOV NP should prioritise further projects that would benefit from what is likely to be constrained local CIL receipts, for example by splitting them into “short” ‘medium’ and ‘longer term’ projects, and defining the time frames for each of these.</p>	DLP Policy DF1 (Delivery of the Plan), in particular paras 11.1.45 to 11.1.51



# GREATER LONDON AUTHORITY

[REDACTED]  
Planning Strategy and Policy Team  
London Borough of Lambeth  
1<sup>st</sup> Floor Phoenix House  
10 Wandsworth Road  
London SW8 2LL

**Department: Planning**

Our reference: LDD22 /NP01/HA01  
Date: 20 December 2018

By email: [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)  
[REDACTED] [ambeth.gov.uk](mailto:ambeth.gov.uk)

Dear [REDACTED]

**Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Southbank and Waterloo Neighbourhood Plan Regulation 16**

Thank you for consulting the Mayor of London on the draft Southbank and Waterloo Neighbourhood Plan (SoWN). As you are aware, all Development Plan Documents in London, including neighbourhood plans must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraphs 184 and 29 of the National Planning Policy Frameworks (NPPF) 2012 and 2018, respectively also require neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the Southbank and Waterloo Neighbourhood Area includes the London Plan and the Lambeth Local Plan.

The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have provided comments, which I endorse, and which are attached at Annex 1.

**The draft new London Plan**

The Mayor published his Draft London Plan for consultation on 1<sup>st</sup> December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan will commence in January 2019 with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Lambeth Development Plan and contain the most up-to-date policies.

The Southbank and Waterloo Neighbourhood Plan (SoWN) is required to be in general conformity with the current London Plan, however any policies that diverge from the Draft New London Plan will become out of date as the Draft New London Plan gains more weight as it

moves towards publication. In addition, the Draft New London Plan and its evidence base are now material considerations in planning decisions.

## **General**

On 20 January 2017, the Mayor provided comments (reference: LDF22/NP/KR01) on the Neighbourhood Forum's earlier consultation on the Southbank and Waterloo Neighbourhood Plan, making suggestions as to how the Plan should progress in light of the London Plan. This letter follows on from that earlier advice.

The Mayor welcomes the aspirations of the Neighbourhood Plan in positively promoting green infrastructure, walking and cycling. The Plan sets out clearly the nature of projects it wishes to invest in throughout the neighbourhood area through the use of CIL and planning obligations. However, the neighbourhood plan is largely aspirational and could be more proactive in identifying suitable sites for a range of purposes including those for housing development in order to meet the neighbourhood area indicative housing requirement of 162 dwellings a year, set out in Lambeth's draft Local Plan.

## **Housing and the Indicative Annual Housing Requirement**

The Lambeth Draft Local Plan (October 2018) sets out the indicative housing requirements for designated neighbourhood areas. The indicative annual housing requirement that has been set for the Southbank and Waterloo Neighbourhood Area is for 162 dwellings a year and this should form a fundamental element of the Neighbourhood Plan's housing policy, underpinning the selection of potentially suitable sites to secure housing delivery.

## **Waterloo Opportunity Area**

The Southbank and Waterloo Neighbourhood Area overlaps with the Mayor's identified Waterloo Opportunity Area (OA). As such, the neighbourhood plan should recognise the significance that Waterloo OA will play in contributing the development capacity to accommodate housing, commercial development and infrastructure, in meeting the needs of the local area and the capital as a whole. The strategic approach to the regeneration and/or growth of Waterloo and other OAs is set out in Draft New London Plan Policy SD1 and Waterloo OA is identified in Table 2.1 which sets out indicative guidelines for the delivery of 1,500 new homes and 6,000 new jobs up to 2041.

## **Central Activities Zone (CAZ)**

The Neighbourhood Area sits within London's Central Activities Zone which is defined in the Draft New London Plan Policy SD4 and its importance and functions are set out in supporting text. The Neighbourhood Plan fails to recognise the significance and the role that the CAZ plays for the local neighbourhood and the whole of London and should adopt the approach set out in the Draft New London Plan. Amendments to the neighbourhood plan should consider the wider context of the area giving more weight to the role and function of Waterloo and Southbank as part of London's CAZ.

**South Bank & Waterloo Neighbourhood Plan Area, image page 14.** The image intends to show the effective boundary of the entire neighbourhood plan area. However, the southwestern boundary of the neighbourhood area is not clear and should be amended so that the full extent of the boundary is visible. Doing so will help to avoid any future boundary issues. The neighbourhood area image should include the boundary of the CAZ, identify the extent of the

Waterloo OA and could include some planning designations relating to heritage assets and others.

**Page 15, table and supporting text.** The table suggests that the neighbourhood area is home to 2,000 residents, while the supporting text states that the area is occupied by 12,000. The correct figure should be used consistently and also the data source used should be cited.

### **Green infrastructure, open space & air quality**

The Mayor welcomes the aspiration of the neighbourhood plan to protect, enhance and provide important green infrastructure in the neighbourhood area which aligns with his ambitions to make more than half of London green by 2050. However, the Southbank and Waterloo Neighbourhood Plan (SoWN) policies should recognise the differences in approach to the protection of open space within and outside areas of deficiency in accordance with Draft New London Plan Policy G4. The neighbourhood plan policies should also take account of the urban greening approach set out in the Draft New London Plan in Policy G5.

**Policy P5 part C.** While the Mayor supports the intention of the Neighbourhood Forum to improve air quality in and around Waterloo station he considers that the policy should aim to promote the use of electric vehicles and other non-polluting forms of active travel in line with the Mayor's Healthy Streets approach but should not attempt to 'restrict diesel taxis and diesel freight vehicles serving the Station' as these are not material planning considerations. See Policy T2 of the Draft New London Plan.

**Policy P9.** The Draft New London Plan has strengthened its approach in seeking the on-site delivery of affordable housing for major developments. This is to ensure the delivery of mixed and inclusive communities. For small housing developments of 25 dwellings or less a more flexible approach to off-site provision can be more acceptable. See Policy H2 of the Draft New London Plan. Furthermore, the SoWN should recognise that the Draft New London Plan's threshold approach to delivering affordable housing sets out that planning applications following the Viability Tested Route will be required to conduct late stage viability reviews in order to maximise the delivery of affordable housing.

**Policy P10 and other guidance.** London is the second most visited city in the world. The economic and regeneration benefits that tourism brings to London are great and therefore the Mayor wishes to ensure that given this importance the city is able to meet the accommodation needs of tourists. The SoWN should adopt a more positive approach in policy making for hotel development, recognising that Waterloo is identified as an Opportunity Area within the Central Activities Zone (CAZ) and as such strategically important serviced accommodation should be promoted there in accordance with Draft New London Plan Policy E10.

**Policy P12.** The Mayor welcomes the neighbourhood plan's support for temporary and pop-up uses in retail frontages, however, amendments to the policy should consider that retail in the capital is changing and that some centres may experience a decline in demand for retail floorspace and should therefore be adaptable to accommodate a broader range of uses which can be appropriately accommodated within retail frontages. Policies should encourage a diversity of uses within retail frontages in accordance with Draft New London Plan Policy SD6A.

**Social infrastructure and culture.** The Mayor welcomes the neighbourhood plans support for arts, culture and leisure activities within the CAZ in accordance with Draft New London Plan

Policy SD4 and it should be noted that both Southbank and Lower Marsh/The Cut have night-time economies of significance at the international/national and regional/sub-regional levels respectively as illustrated in Table A1.1 of the Draft New London Plan.

I hope these comments inform the development of the Southbank and Waterloo Neighbourhood Plan. If you have any specific questions regarding the comments in this letter please do not hesitate to contact [REDACTED] [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](https://www.london.gov.uk).

Yours sincerely

A large black rectangular redaction box covering the signature area.

[REDACTED]  
**Chief Planner**

Cc Florence Eshalomi, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
Lucinda Turner, TfL

GREATER **LONDON** AUTHORITY**Annex 1 – Transport for London Comments**

Dear Lambeth Council Planning Policy and Strategy team

**Draft South Bank and Waterloo Neighbourhood Plan November 2018; TfL Comments**

Thank you for consulting TfL Spatial Planning. We provide comments on draft local plans in respect of London Plan and Mayor's Transport Strategy (MTS) policy. I understand a separate response will be submitted by colleagues in respect of TfL property and development interests.

TfL's interests in the Neighbourhood Area (NA) are varied, and include:

- Waterloo London Underground (LU) station, one of the busiest in London
- Westminster Bridge, Lambeth Palace Road, York Road and Stamford Street, which form part of the Transport for London Road Network (TLRN) and for which TfL is the highway authority
- Waterloo Bridge, Westminster Bridge Road and Waterloo Road which for part of the Strategic Road Network (SRN) and for which TfL and the boroughs have a joint traffic management function
- Numerous bus stops, served by a number of key central London bus routes
- A number of Cycle Hire docking stations
- Legible London signage
- River services
- Cycle and pedestrian safety to support the Mayor's 'Vision Zero' target of no killed or seriously injured (KSI) on London's roads by 2041

Generally, the transport-related policies in the draft South Bank and Waterloo Neighbourhood Plan (SBWNP) are supported, being in broad accordance with draft new London Plan (DLP) and MTS policy and direction of travel. Specific comments are set out below, either where the draft Local Plan could be improved in respect of, or is at variance with, the DLP and MTS, or where specific wording would support determination of current major planning applications in the borough and/or TfL's statutory transport functions.

**Policy P4, page 25**

This policy could go further and specifically support retention of existing and developer funding for the planting of new street trees. There have been examples of development proposals in the past in the NA that risked loss of mature street trees and TfL fought hard to resist. Mature street trees in the NA are particularly valuable, and some roads would benefit from new planting.

Specific policy support in the NA to resist development that results in the loss of street trees, and to support developer contributions for new street trees, would therefore be welcomed (rather than a requirement simply 'to mitigate' any loss as per the current draft).



Specific mention of street tree planting in the 'projects table' on page 77 would be welcomed.

#### **Policy P5 b), page 25**

The policy to '*create an improved, pedestrian friendly streetscape, encouraging walking as the primary mode*', and reference to '*TfL guidance*' is supported. However, the policy and/or supporting text could be strengthened to reference the Mayor's Healthy Street Approach<sup>1</sup> and the expectation that developers will need to follow this approach in the design of public realm. Note that the benefits of this policy and of the Healthy Streets Approach are not restricted to air quality – there are safety, comfort, liveability and personal health benefits also.

#### **Paragraph P5 b) page 29**

Care must be taken not to discourage cycling – as some of the wording here seems to suggest - which could undermine this and other policies. Any pedestrian/cyclist conflict should be mitigated by good space design and/or provision of attractive alternative routes, rather than 'demonising' and restricting cyclist. The London Cycle Design Standards<sup>2</sup> should be followed in this respect.

#### **Paragraph '4', page 44**

This mentions the Cornwall Road bus garage as a 'strategic site allocation'. However, the draft 'partial review' Lambeth Local Plan that was recently consulted on deletes this site from the strategic site allocations list, so the draft NP should reflect this i.e. by deleting reference to the site here. The bus garage plays a vital role in supporting the central London bus network, in particular being the 'home base' for electric buses, which of course help improve air quality in the NA and elsewhere.

#### **Section 8.2 page 62/63**

TfL would welcome policy support in the NP that requires development in the NA to contribute towards delivery of step-free access (SFA) to the Northern line and Bakerloo line northbound platforms at Waterloo LU station – these are the 'missing step free links' at this key interchange. The likely areas required for interventions to provide SFA lie under the 'Elizabeth House' site in York Road. We would welcome SFA at Waterloo LU station be included in the 'projects table' on page 77.

#### **Policy P18, page 62**

The requirement for Legible London signage provision for new development is supported. This policy/supporting text could be strengthened by specific mention of the need for public realm associated with new development to be designed in accordance with the Healthy Streets Approach, as per comment above.

#### **Paragraph 1 c), page 63**

The statement '*Rationalising buses and bus stops*' needs to be used with care. TfL is consulting on a review of central London bus services, which may result in

<sup>1</sup> <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>

<sup>2</sup> <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>

changes to the local bus network, however the word 'rationalisation' suggests a reduction. Bus infrastructure capacity, particularly stops and stands, is often at a premium in the NA, as elsewhere in inner London, so this is unlikely to be supported by TfL.

**Paragraph 1 f), page 63**

This states '*Creating new walking routes through the area which separate pedestrians from motorised vehicles and, where possible, cyclists including alongside railway viaducts, under the station and through back streets*'. Following on from the comment earlier, care is needed not to discourage cycling through 'bans', as this wording implies, as this will undermine other policies in the NP, as well as local and Mayoral policy.

**Para 2 page 63**

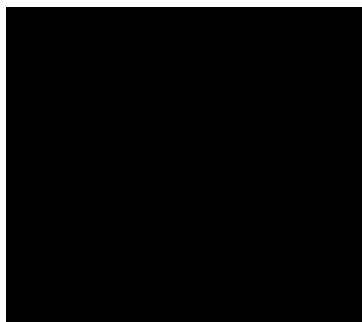
Support for developer-led 'Healthy Streets' improvements to York Road would be welcomed.

**Appendix 9, page 119**

'*Developer guidelines for the implementation of green infrastructure & air quality infrastructure*'. Any proposals for the TLRN will need to accord with TfL's Streetscape Guidance<sup>3</sup>. Design of public realm should follow the Healthy Streets Approach.

I hope you find these comments helpful and trust you will consider how they can be addressed in the next draft of the Local Plan. If you have any questions please feel free to contact me.

Yours faithfully



**Principal Planner  
Spatial Planning**

Email: [REDACTED]@tfl.gov.uk

Direct line: [REDACTED]

## GREATER LONDON AUTHORITY

Development, Enterprise and Environment

**South Bank and Waterloo Neighbourhood Forum**

██████████ Secretary,  
SoWNeighbours,  
Build Studios,  
203 Westminster Bridge Road,  
London SE1 7FR

**Our ref:** LDF22/NP/KR01**Date:** 20 January 2017**Sent via email to** ██████████@wearewaterloo.co.uk

Dear ██████████

**Re: South Bank and Waterloo Neighbourhood Plan 2017-2032 Pre-submission Consultation**

Thank you for consulting the Mayor of London on the South Bank and Waterloo Neighbourhood Plan 2017-2032. As you are aware, all Local Development Plan Documents in London including neighbourhood plans have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 184 of the NPPF also requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. The Local Plan for the South Bank and Waterloo Neighbourhood includes all the Development Plan Documents (DPD) adopted by Lambeth and Southwark Councils and the London Plan.

The Neighbourhood Plan recognises that development will occur within the South Bank and Waterloo area and as such it is generally welcomed. However, there are some matters where clarification would help to ensure the plan is in general conformity with the London Plan as well as the other strategic policies in the Local Plan.

**Central Activities Zone (CAZ)**

The whole of the Neighbourhood is within the CAZ. This is an important strategic designation reflecting London's role as a global city. It is an area where land is at a premium, public transport is generally good and dense forms of development are to be expected, in line with London Plan Policies 2.10 and 2.11. The London Plan does recognise that there are also residential neighbourhoods within the CAZ, in Policy 2.12.

Whilst it is not necessary for the document to have a specific policy on CAZ (because this is covered in the London Plan), it would be useful to reference the CAZ designation early in the Neighbourhood Plan as part of setting the scene for the document and ensuring that the Neighbourhood Plan recognises that there is likely to be a significant quantum and distinct forms of development within its area and that much of the development will be dense in character. There is only find limited reference to the CAZ within the detailed sections of the document.

**Waterloo Opportunity Area**

The Waterloo Opportunity Area is located within the Neighbourhood Plan Area. This will be one of a number of important strategic locations for large scale new development within London. The London Plan indicates that at least 2500 new homes and 15000 additional jobs will be delivered within the Waterloo Opportunity Area.

Whilst it is not necessary for the document to have a specific policy on the Waterloo Opportunity Area (because this is covered by the London Plan), there should be a reference the Waterloo Opportunity Area designation early in the Neighbourhood Plan as part of setting the scene for the document and ensuring that the Neighbourhood Plan recognises that there is likely to be significant development around Waterloo, capitalising on the area's excellent public transport and that therefore much of the development will be dense in character. There appears to be only one reference to the Waterloo Opportunity Area Planning Framework, (P12) and this did not make it clear that the area is expected to be a focus for significant new development.

## **Streetscape & Transport (Section 8.6)**

### *Greenways*

Policy P15, promotes the development of greenways through the area, improving conditions for walking is supported by TfL and is compliant with London Plan policy 6.10. TfL would assess any schemes on the Transport for London Road Network, in the context of the Streetscape Guidance and the London Cycle Design Standards and it is recommended that this guidance is referenced within this plan.

### *Legibility*

The promotion of wayfinding through Policy P16 using the Legible London scheme through the area is noted and supported as being compliant with London Plan policy 6.10.

### *Cycling*

TfL is continuing to develop the Cycle Hire network in the area, owing to significant demands around the station and South Bank. The plan should ideally reference cycle hire as a mode when considering the demands of new developments in the area.

### *Roads: Major schemes*

TfL has two major projects under development in the area. TfL recommends that the Waterloo City Hub project is referenced within the plan, as this seeks to deliver aims of the forum in improving conditions for walking and cycling.

Lambeth and Southwark Councils have adopted Community Infrastructure Levies (CIL). Use of the borough CIL is seen by TfL as a potentially important contribution to the delivery of key transport infrastructure in the boroughs, be it localised pedestrian and cycle improvements or major rail or highway infrastructure. The NDF share of borough CIL (potentially 25%) could assist in improvement of transport infrastructure. TfL invites further discussions with the borough and the NDF about the allocation of CIL for transport infrastructure serving the Waterloo and Southbank areas and the timing of payments. This does not replace the need for site specific mitigation which will continue to be secured through section 106 agreements.

It should be noted that TfL has written separately to the council and Neighbourhood Forum with more detailed comments to supplement this report.

If you would like to discuss any of the representations in more detail, please contact [REDACTED]@london.gov.uk) or for the Streetscape and Transport aspects contact [REDACTED]@tfl.gov.uk ) who will be happy to discuss /arrange a meeting.

Yours sincerely,



**Strategic Planning Manager**

cc Florence Eshalomi, London Assembly Constituency Member  
Tony Devenish, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL



**From:** [REDACTED]  
**To:** [contact@isleofdogsforum.org.uk](mailto:contact@isleofdogsforum.org.uk); [neighbourhoodplanning@towerhamlets.gov.uk](mailto:neighbourhoodplanning@towerhamlets.gov.uk)  
**Cc:** [REDACTED]  
**Subject:** RE: GLA Officer Response Isle of Dogs Neighbourhood Plan (IoDNP) – Regulation 14 Consultation  
**Date:** 17 May 2019 14:52:00  
**Attachments:** [20190514-TfL response to Isle of Dogs Neighbourhood Plan v2.pdf](#)

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Dear Sir/Madam

Thank you for consulting the Mayor of London on the Isle of Dogs Neighbourhood Plan (IoDNP) (Regulation 14). As you are aware, all Development Plan Documents in London, including Neighbourhood Plans, must be in general conformity with the London Plan under sections 24 (1) (b) and 38(10) of the Planning and Compulsory Purchase Act 2004. Paragraphs 29 of the National Planning Policy Framework (NPPF) 2018, requires neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the IoDNP includes the London Plan and Tower Hamlet's Local Plan.

Transport for London (TfL) have provided comments which are included as an attachment.

This letter sets out where you may need to amend proposed policies and supporting text to be more in line with the current London Plan and the emerging Draft New London Plan.

### **The draft new London Plan**

The Mayor published his Draft London Plan for consultation on 1st December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan commenced on 15 January 2019. The Panel report is expected in the summer with publication anticipated in Winter 2020. Once published, the new London Plan will form part of Tower Hamlet's Development Plan and contain the most up-to-date policies.

Given the anticipated timetable for the submission of the IoDNP, it is likely that it will be required to be in general conformity with the new London Plan. In addition, the Draft New London Plan and its evidence base are now material considerations in planning decisions.

### **General**

In the opening chapter the Neighbourhood Plan should include a map showing clearly and precisely the extent of the IoDNP boundary. This should be accompanied, by contextual analyses, setting out how the Neighbourhood Area relates to Tower Hamlets and further afield in the wider context of London. More context in the form of the Draft New London Plan should be taken into account, especially with respect to the emerging Northern Isle of Dogs Opportunity Area Planning Framework and the Central Activities Zone. The Neighbourhood Plan should recognise the significance of the area in terms of its strategic importance within the current and Draft New London Plans in the role it plays in hosting dynamic clusters of world city businesses and other specialist functions which are of national and international importance as set out in Draft New London Plan Policies SD4, E1 and paragraph 1.4.10. The Draft New London Plan, in Table 2.1 sets out indicative guidelines for the Isle of Dogs Opportunity Area which is comprised of 29,000 new homes and 110,000 new jobs.

The GLA would like to see more proactive objectives that would help deliver much needed housing across the capital and within the London Borough of Tower Hamlets in accordance with Good Growth Policy GG2 Making the best use of land. The Neighbourhood Plan should recognise

that Tower Hamlets' housing target has recently decreased from 3,931 to 3,511 homes per annum and the neighbourhood plan should establish how it will positively contribute towards this in agreement with the local authority. Once 'made' Neighbourhood Plans form part of the Statutory Development Plan and should be aligned with the strategic needs of the wider local area. A proactive approach would also include site allocations which the IoDNP lacks.

Northern Isle of Dogs is recognised in the Draft New London Plan as a CAZ satellite location for world city office functions. While it is geographically separate from the CAZ it is to be treated as a part of the CAZ and relevant Draft New London Plan Policies should apply, including Policy E1, which identifies Northern Isle of Dogs as a strategic location for office development.

### **Infrastructure**

The emerging Northern Isle of Dogs Opportunity Area Planning Framework is supported by evidence including for the Isle of Dogs and South Poplar Development Infrastructure Funding Study 2017. The up-to-date study identifies the required infrastructure needed to support plans for growth in the area and acknowledges the funding gap that will need to be addressed. At 35% affordable housing delivery, the study suggests there is a funding gap of £162 million (maximum growth scenario). The draft Neighbourhood Plan's requirement for Infrastructure Impact Assessments is not considered to be a positive and proactive approach and would only confirm what has already been evidenced and could ultimately result in the reduced delivery of affordable housing. The requirement for infrastructure impact assessments should therefore be removed from the IoDNP. The Neighbourhood Forum is advised instead to recognise that once the IoDNP is formally adopted, 25% of CIL receipts collected in the area will be available to the Neighbourhood Forum and the plan should therefore set out how it wishes to allocate that funding and what it considers to be its infrastructure priorities. When setting out these priorities in a positive manner the IoDNP should reflect the priorities set out in Part D of Draft New London Plan Policy DF1.

### **Housing/Design**

The sustainable residential quality matrix (SRQ Matrix) which set out appropriate residential densities in locations with various public transport accessibility has been removed from the Draft New London Plan. It is recognised that the matrix formed a basis for design guidance and was rarely adhered to as an upper limit to residential development design. Hence the decision to remove this from the Draft New London Plan and allow Local Authorities more control and flexibility about residential density in their decision making in order to reflect local context and capacity. The Draft New London Plan enables Local authorities to set out how they wish to address this issue through the approach set out in Draft New London Plan Policy D6 Optimising density. The IoDNP should note that the SRQ Matrix has now been removed from the Draft New London Plan and amend the Neighbourhood Plan accordingly by removing references to it and the upper limit of 1,100 habitable rooms per hectare in Policy D2 (which formed the upper limit of the SRQ Matrix). The IoDNP should acknowledge and reflect that the Draft New London Plan in Policy D6 states the higher the density of proposed residential development the greater the level of scrutiny that is required of its design. The draft new London Plan sets out density thresholds by PTAL for when increased design scrutiny and management plans are to be submitted as part of planning applications. In addition, paragraph 3.6.2A (Draft New London Plan showing minor suggested changes) makes infrastructure impact assessments an application requirement where proposed capacities will exceed future planned infrastructure provision.

### **Empty sites and air quality**

The IoDNP's intention in Policy ES1, that vacant land be used for community meanwhile uses is

welcomed by officers and reflects Draft New London Plan Policies SD7, D7 and HC5. IODNP is encouraged to explore wider opportunities for other meanwhile uses such as for housing and for food growing as set out in Draft New London Plan Policies H4 and G8.

Officers consider that Paragraph 9.1.3 of the Draft New London Plan should be reflected in Policy AQ1 of the IoDNP and should recognise that development proposals within the Isle of Dogs Opportunity Area should aim to be air quality positive by implementing measures that will actively reduce air pollution. The need to improve air quality in the area is further supported and strengthened in the Draft Isle of Dogs and South Poplar Opportunity Area Planning Framework.

### **Estate Regeneration**

It is clear that the forum want to ensure that future estate regeneration is conducted in a fair and consistent manner. However, Policies ER1-ER9 concern issues that are beyond the remit of planning and are not considered to be material considerations. This includes policies involving balloting processes for estate regeneration. It should be noted that the Mayor recognises the significance of delivering estate regeneration which takes into account the importance of existing and new residents and communities needs and rights. Therefore, in accordance with Policy H10 and paragraph 4.10.3 of the Draft New London Plan estate regeneration should take account of the requirements of the Mayor's Good Practice Guide to Estate Regeneration (2018) and it should also be recognised that any landlord seeking GLA funding for Estate Regeneration, involving the demolition of social homes to show that residents have supported their proposals through a ballot (see <https://www.london.gov.uk/what-we-do/housing-and-land/improving-quality/estate-regeneration#>).

I hope these comments inform the development of the IoDNP. If you have any specific questions regarding the comments in this letter please do not hesitate to contact [REDACTED] [REDACTED] on 020 7084 [REDACTED] or at [REDACTED] [london.gov.uk](https://www.london.gov.uk).

Regards

[REDACTED] [REDACTED]

**Senior Strategic Planner, London Plan Team**  
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TfL ref: TOWH/19/321

██████@isleofdogsforum.org.uk

[by email only]

**Transport for London**  
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Stratford  
London E20 1JN

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

14 May 2019

Dear Sir/Madam,

**Re: Isle of Dogs Neighbourhood Plan 2019-2030**

*Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development to reflect TfL's interests as a landowner and potential developer.*

Thank you for giving Transport for London (TfL) the opportunity to comment on the Isle of Dogs 'Basic' Neighbourhood Plan. The draft London Plan was published in December 2017 and was open for public consultation until March 2018. Following the consultation, a revised draft was published in August 2018 showing Minor Suggested Changes made in response to consultation comments. The draft London Plan is a material consideration in assessing local policy and determining planning applications.

Please note that TfL has recently responded to the recent consultation on the proposed Main Modifications to London Borough of Tower Hamlets' Local Plan.

TfL will continue to work with all partners to ensure that new development in the area covered by the Isle of Dogs Neighbourhood Plan enables people to travel by walking, cycling and public transport and contributes to Good Growth. We welcome the aspiration of the draft Isle of Dogs 'Basic' Neighbourhood Plan to support growth while enabling people to get around by these sustainable transport modes.

We would welcome, however, that the Neighbourhood Plan set out an approach to traffic reduction as set out in the Mayor's Transport Strategy (proposal 22). We further encourage including the Healthy Streets 'wheel diagram' (see Appendix B) in the Neighbourhood Plan to fully embed the Healthy Streets Approach into planning decisions in the area.

The draft Neighbourhood Plan is accompanied by an Infrastructure Baseline Analysis report. It is also unclear how this analysis would be used in any potential Infrastructure Impact Assessment. Infrastructure Impact Assessment is not an established tool for assessing planning applications. We request clarity on how this is proposed to be used. We have concerns that the Infrastructure Baseline Analysis report does not include several transport schemes in the pipeline that will enhance transport connectivity and capacity in the Plan area. For example, the analysis does not reflect planned future infrastructure including the Elizabeth line, DLR enhancements, bus enhancements, and walking and cycle connectivity enhancements. TfL is also working with Tower Hamlets and other partners in assessing the feasibility of a new river crossing between North Greenwich and the east of the Isle of Dogs. More widely, much of the evidence provided in support of the Neighbourhood Plan is anecdotal and does not necessarily reflect a true picture of infrastructure provision and demand on the Isle of Dogs.

We have set out detailed comments and proposed changes on the following pages which we hope are helpful. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth.

Sincerely,

██████████ | Acting Manager

London Plan and Planning Obligations team | City Planning

Email: ██████████@tfl.gov.uk



## Appendix A: Specific suggested edits and comments from TfL on the Isle of Dogs Neighbourhood Plan

Section	Page	Track change/comment
2.7.9	5	<p>“Quick, efficient and free-flowing transport options – whether cycling, walking, buses, DLR, boats or cars – all working together effectively.”</p> <p>‘Free-flowing’ transport is not always possible given the necessary interaction of different road users and the need to manage traffic and congestion. We suggest amending this objective to reflect Vision Zero and the Healthy Streets Approach as set out in the Mayor’s Transport Strategy. Demand management measures are needed to reduce car use in particular as space efficient modes are necessary to effectively move people and goods in high density, urban environments such as the Isle of Dogs.</p>
3.5, 3.6, 3.7	7-8	These policy summaries should reflect any comments or track changes proposed below.
4.4.2 Policy DI – Infrastructure Impact Assessment	10-11	<p>The policy needs clarification with regard to the definition of “sufficient infrastructure capacity” to support new development.</p> <p>It is appropriate to plan for the impact of cumulative development. However, clarification should be given on how mitigation of cumulative impact is proposed to be shared among each development/applicant.</p>
4.4.2.4	11	<p>Please amend text:</p> <p>“If the proposed development is contingent on the provision of new <b>or enhanced</b> Infrastructure (including, without limitation, public transport services), the development should be phased accordingly.”</p>

Section	Page	Track change/comment
4.4.2.5	11	<p>“Infrastructure impacts will be considered unacceptable where they result in negative impacts that cannot be adequately mitigated.”</p> <p>We request clarity on what is considered ‘adequate’ mitigation. As part of this, opportunities to enable walking and cycling should be considered to support the public transport network, in line with London Plan Policy T4D.</p>



## Appendix B: Healthy Streets Wheel



Source: Lucy Saunders

**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

**Isle of Dogs Neighbourhood Planning Forum**

12 Neptune Court  
Homer Drive  
London  
E14 3UQ

**Our ref:** LDF30/LDD21/SG01

**Date:** 19 April 2017

Sent by email to [REDACTED]@gmail.com

Dear Sir/Madam,

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations  
2012**

**RE: Isle of Dogs Neighbourhood Planning Forum - Draft Neighbourhood  
Plan (Regulation 14) Consultation**

Thank you for consulting the Mayor of London on the Isle of Dogs Draft Neighbourhood Plan. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. This response highlights elements of the draft document which could raise issues of non-conformity if not addressed and provides some more general comments and suggestions.

The National Planning Practice Guidance sets out that Neighbourhood Planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years in ways that meet identified local need and make sense for local people. The Isle of Dogs Neighbourhood Area is located entirely within the Isle of Dogs and South Poplar Opportunity Area and given the importance of the Opportunity Area to London's housing and employment growth, the development of this Neighbourhood Plan alongside the emerging Tower Hamlets Local Plan and Opportunity Area Planning Framework is welcomed and the objectives and vision of the Plan are strongly supported.

The GLA's comments are set out below and include representations from Transport for London (TfL).

**General Comments**

The Draft Neighbourhood Plan currently takes the form of three separate but interrelated documents: the Policy Document, the Back up document and a separate Estate Regeneration Briefing. It is understood that the 'Backup' and 'Policies' documents will be combined following consultation. To create a holistic and sound plan with a strong narrative, it is recommended that the policies are set out in response to context and justification in this combined document. It is also recommended that some of the non-planning matters such as the Estate Regeneration guide become an annex to the Neighbourhood Plan. The proposed approach of a 'quick plan' and a 'longer plan' is interesting and understood to have been as a

result of the need to urgently address local issues. However, it is recommended that as many of the policies as possible be included in the plan to reduce duplication of effort in testing and approving the plan at Examination in Public.

The 'Backup' document provides useful context to the rate and pace of development change in the plan area and the stated vision and objectives of the document to ensure that communities continue to enjoy a high quality of life are fully supported. However, further narrative could be added to the deprivation section as this is one area where the Neighbourhood Plan could target specific policy interventions at a very local level. It should also be noted that the Isle of Dogs & South Poplar OAPF is due to be published for public consultation in Summer 2017 and adopted by Autumn 2017.

The plan would also be strengthened through the use of maps and diagrams describing the existing context and spatial implications of the policies. Within the quick plan, this could be used to identify potential projects / areas for additional focus in the long plan (such as identifying empty sites and public realm projects). It is recommended that this make reference to the emerging OAPF place-making and local connections strategy.

The development statistics outline the permitted and emerging development proposals which have been used to inform population projections. These calculations use occupancy assumptions which are lower than those recorded in the census. The need to acknowledge demographic change is supported, and it is recommended that rather than making assumptions on the future occupancy rates, this is identified as an area where further evidence and monitoring is required to ensure adequate and timely social infrastructure provision.

As part of the OAPF, TfL has been working closely with GLA and the Council to develop a comprehensive transport strategy for the area to address key challenges, for example around crowding, congestion, connectivity and severance, as well as specific issues around construction and freight. In addition to this an emerging Local Connections Strategy and Design Guide has been developed to sit alongside the OAPF. This will look to address the barriers to active travel in the OA, as part of the wider package of transport measures to support both the existing communities as well as the proposed growth in the area over the twenty year OAPF plan period.

## **Comments on Policies**

### **Density (D1, D2)**

It is acknowledged that high density residential development and resulting strain on infrastructure on the Isle of Dogs is an important issue for this plan to tackle. However, it is unclear how policy D1 would work from a development management perspective, as it also stipulates that the policy would relate to demonstrating how 'all existing and approved developments' have also met their infrastructure requirements. It is also unclear what the evidence base for demonstrating this would entail, which would be necessary to find this policy 'sound'. While the provision of infrastructure is a key concern for the Plan area, this policy as drafted could potentially limit all new development coming forward and as such raises a potential issue of general conformity with the London Plan, which seeks to optimise housing delivery.



These policies might be complemented by some spatial element with the results of the OAPF DIF study, when available, which would allow for a co-ordinated and more specific set of infrastructure asks for each site.

It is not necessary to repeat the Housing SPG in policy D2. However, perhaps further interpretation as to how this might be applied in the plan area could make for a more specific and sound policy.

### **CIL (C1, C2, C3, C4)**

There is some repetition of existing planning policy in this section and it is not clear that all of these policies relate to development matters. There are also concerns relating to the conformity of the proposals with CIL regulations.

Further discussion is recommended on how the final policies will be reflected in the OAPF delivery chapter.

### **Estate regeneration and residents' associations (ER1 to ER9, GR1)**

The plan contains many detailed policies relating to estate regeneration (ER1 to ER9). Many of these policies aim to address housing management rather than planning matters. The Mayor of London is seeking to improve estate regeneration processes in London and encourages 'full and transparent consultation' with residents as part of estate regeneration process. This is set out in 'Homes for Londoners: draft Good Practice Guidance to Estate Regeneration' which should be referenced in this document:

[https://www.london.gov.uk/sites/default/files/draft\\_affordable\\_housing\\_and\\_viability\\_spg\\_2016.pdf](https://www.london.gov.uk/sites/default/files/draft_affordable_housing_and_viability_spg_2016.pdf)

Policy GR1 relating to establishment of new residents' associations is another policy which better relates to housing management issues rather than traditional planning policies. Although the typologies of high density residential units coming forward within the plan area could potentially justify a more unique approach to management which may also be able to deal with issues relating to build quality and insurance. It may be possible to require a housing management plan to be secured by condition (although this would need to be evidence based).

### **Empty sites (ES1)**

This policy is welcome given the pressure on land uses and lack of open space in the Plan area, however it might be appropriate to provide further information on how this would be applied.

### **3D Model (3D1, 3D2)**

The aspiration to develop a 3D model for the Plan Area is in line with GLA proposals to create a London-wide 3D model. As the GLA is currently looking to commission a model, it would be beneficial to make any future model compatible with a wider GLA model.

However, the wording of this policy should be more specific to ensure it is clear how exactly the model would be used for planning purposes and what part the developer is meant to play in funding its development and ongoing management.

### **Broadband (BBA1, BBA2, BBA3)**

The supply of broadband to homes is a commercial matter unless the policy is making specific infrastructure related requirements on sites. The new London Plan is proposing Policy SI 1 Digital Connectivity Infrastructure, which will facilitate the provision of the digital connectivity infrastructure a modern world city needs. The policy will set out that in collaboration with providers, developers and other key stakeholders, the Mayor will develop guidance/good practice to increase awareness and relevant capability amongst London boroughs and developers on the effective provision of digital connectivity.

In terms of development management, the policy will set out that the development should aim for greater connectivity speeds than set out in Building Regulations across London in order to maximise future-proofing and ensure London's global competitiveness. It will also set out that development should ensure that sufficient ducting space for digital connectivity infrastructure is provided. Additional requirements with regards to communications access and security may depend on the type of the development. And that development should support the effective use of the public realm (street furniture, bins, trees, etc) to accommodate well designed and located mobile digital infrastructure.

It is recommended that this emerging policy be referenced in the neighbourhood Plan and also that these matters could also be included for resolution within a housing management plan or as part of the developer forum (to be set up through the Freight and Delivery work – see below).

### **Construction Management and Communication (CC1, CC2, CC3)**

A core aspiration for the OAPF will be to understand and address the impacts of construction, delivery and servicing freight. TfL is working closely with the Council to develop a strategy for the area, including coordinating the private sector and enabling communications with local residents. As part of this strategy consideration to a variety of mitigation measures will need to take place, including the role of river freight and consolidation centres.

### **Sustainable Design & Air Quality (SD1, AQ1)**

The Mayor welcomes the draft Plan's focus on protecting the environment and health. However, it is unclear how draft policy on air quality and sustainable design can be implemented on technical grounds and whether this approach would affect the viability of development proposals.

A formal opinion on general conformity will be issued when requested at proposed submission stage. Before then, we forward to continuing to engage with you on this emerging Plan to ensure its relationship with the draft OAPF. It would be useful to discuss some of the issues raised in this response in more detail in the coming weeks, particularly to provide an update in the findings of the Development Infrastructure Study.

In the meantime if you have any specific questions relating to this response, please do not hesitate to contact either me or [REDACTED]

Yours sincerely

[REDACTED]

Strategic Planning Manager

Cc Unmesh Desai, London Assembly Constituency  
Tony Devenish, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL

**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

Neighbourhood Planning Consultation  
Strategic Planning – Plan Making  
London Borough of Tower Hamlets  
PO BOX 55739  
London  
E14 2BG

**Our ref:** LDF30/LDD22/CG01  
**Date:** 22 February 2018

Sent by email to: [neighbourhoodplanning@towerhamlets.gov.uk](mailto:neighbourhoodplanning@towerhamlets.gov.uk)

Dear Sir/Madam,

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations  
2012**

**RE: Isle of Dogs Neighbourhood Planning Forum - Draft Neighbourhood  
Plan (Regulation 15) Consultation**

Thank you for consulting the Mayor of London on the Draft Isle of Dogs Neighbourhood Plan. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments on the Regulation 14 version of the document on 19 April 2017.

The National Planning Practice Guidance sets out that Neighbourhood Planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years in ways that meet identified local need and make sense for local people. The Isle of Dogs Neighbourhood Area is located entirely within the Isle of Dogs and South Poplar (IoD & SP) Opportunity Area and given the importance of the Isle of Dogs Opportunity Area to London's housing and employment growth, the development of this Neighbourhood Plan alongside the emerging Tower Hamlets Local Plan and Opportunity Area Planning Framework is welcomed.

The Mayor is of the opinion that the Neighbourhood Plan is not in general conformity with the London Plan as it could undermine the delivery of housing in the Neighbourhood Plan area and therefore the ability of Tower Hamlets to meet its housing completions target. Of greatest concern are draft neighbourhood plan policies D1 on density and infrastructure delivery and ER1 to ER8 on estate regeneration. These concerns are detailed below.

The Mayor has afforded me delegated authority to make more detailed comments which are set out below and include representations from Transport for London (TfL), which I endorse. TfL's detailed comments are attached as Annex 1.



## **The draft new London Plan**

As I am sure you are aware, the Mayor published his draft London Plan for consultation on 1<sup>st</sup> December 2017. It is anticipated the Examination in Public of the draft London Plan will take place in the Autumn 2018 with publication in Autumn 2019. Once published, the new London Plan will form part of Tower Hamlets' and the neighbourhood forum's Development Plan and contain the most up-to-date policies. The Isle of Dog Neighbourhood Plan is required to be in general conformity with the current London Plan, however any policies that diverge from the draft London Plan will become out of date as the draft London Plan gains more weight as it moves towards publication. In addition, the draft London Plan and its evidence base will now be a material consideration in planning decisions.

## **General Comments**

The consolidation of the originally consulted draft documents into a single Neighbourhood Plan document is welcome. The initial proposed approach of a 'quick plan' and a 'longer plan' in order to progress as a result of the need to urgently address local issues is still included in the draft document. This approach should not result in the duplication of effort in testing and approving the plan at Independent Examination.

The initial section of the draft Neighbourhood Plan provides useful context to the rate and pace of development change in the plan area and the vision and objectives of the document to ensure that communities continue to enjoy a high quality of life are fully supported. As stated in the previous response, further narrative could be added to the deprivation section as this is one area where the Neighbourhood Plan could target specific policy interventions at a very local level. The new reference to the IoD & SP OAPF is welcome.

As part of the OAPF, TfL has been working closely with GLA and the Council to develop a comprehensive transport strategy for the area to address key challenges, for example around crowding, congestion, connectivity and severance, as well as specific issues around construction and freight. In addition to this an emerging Local Connections Strategy and Design Guide has been developed to sit alongside the OAPF. This will look to address the barriers to active travel in the OA, as part of the wider package of transport measures to support both the existing communities as well as the proposed growth in the area over the twenty year OAPF plan period.

## **Comments on Policies**

### **Density (D1)**

It should be noted that the draft new London Plan no longer includes a density matrix and instead includes strong policies to support a design led approach to determine the scale of development on individual sites.

It is acknowledged that high density residential development and resulting strain on infrastructure on the Isle of Dogs is an important issue for this plan to tackle. However, as stated in the Mayor's previous correspondence it is unclear how policy D1 would work from a development management perspective, as it also stipulates that the policy would relate to demonstrating how 'all existing and approved developments' have also met their infrastructure requirements. It is also unclear what the evidence base for demonstrating this would entail,



which would be necessary to find this policy ‘sound’. While the provision of infrastructure is a key concern for the Plan area, this policy as drafted could potentially limit all new development coming forward and as such raises a potential issue of general conformity with the London Plan, which seeks to optimise housing delivery. It could potential undermine the ability of Tower Hamlets to deliver its housing target as set out in Policy 3.1 of the London Plan and Policy HI of the draft new London Plan.

A policy could be developed to complement the results of the OAPF DIF study by introducing some spatial element to the provision of infrastructure, which would allow for a co-ordinated and more specific set of infrastructure asks.

### **CIL (C1, C2, C3, C4)**

There is some repetition of existing planning policy in this section and it is not clear that all of these policies relate to development matters. There is also concern relating to the compliance of some of the proposed uses for the funds with the CIL regulations.

Further discussion is recommended on how the final policies will be reflected in the OAPF delivery chapter.

### **Estate regeneration and residents’ associations (ER1 to ER8, GR1)**

The plan contains many detailed policies relating to estate regeneration (ER1 to ER8). In February 2018, the Mayor published ‘Better Homes for Local People: Good Practice Guide to Estate Regeneration’ which sets out the Mayor’s expectations for how local authorities and housing associations should engage with residents as part of estate regeneration schemes. This includes outlining his support for the principle of requiring resident ballots in estate regeneration schemes which involve the demolition of existing homes.

The objective of the planning process is to manage the development of land and buildings in order to ensure that sustainable development is achieved. Decisions are taken by planning officers under delegation, elected councillors and other statutory decision takers (including the Mayor for certain schemes). There is no legal basis to require either holding a ballot or the results of a resident ballot to be binding on planning decisions. Instead, it is proposed that the GLA applies a new condition in its Affordable Housing Capital Funding Guide requiring evidence of a positive vote in a resident ballot before new allocations of affordable housing grant are made to estate regeneration projects that involve demolition of existing homes. This approach is set out in ‘Proposed new funding condition to require resident ballots in estate regeneration’ consultation paper at:

<https://www.london.gov.uk/sites/default/files/consultation-on-a-new-funding-condition-requiring-resident-ballots-in-estate-regeneration-schemes.pdf>

### **Empty sites (ES1)**

This policy is welcome given the pressure on land uses and lack of open space in the Plan area, however it might be appropriate to provide further information on how this will be applied.

### **3D Model (3D1, 3D2)**

The aspiration to develop a 3D model for the Plan Area is in line with GLA proposals to create a London-wide 3D model. As the GLA is currently looking to commission a model, it would be beneficial to make any future model compatible with a wider GLA model.

However, the wording of this policy should be more specific to ensure it is clear how exactly the model would be used for planning purposes and what part the developer is meant to play in funding its development and ongoing management.

### **Broadband Access (BBA1, BBA2, BBA3)**

The supply of broadband to homes is a commercial matter unless the policy is making specific infrastructure related requirements on sites. The new draft London Plan includes a new policy on digital connectivity (Policy SI6) which aims to facilitate the provision of digital connectivity infrastructure a modern world city needs. In development management terms, the draft London Plan policy is directive and seeks developers include certain design measure to support digital connectivity in their schemes.

### **Construction Management and Communication (CC1, CC2, CC3)**

A core aspiration for the OAPF will be to understand and address the impacts of construction, delivery and servicing freight. TfL are proactively working with the borough, as part of the OAPF process, to develop a coordinated approach to construction logistics for the area. The Neighbourhood Forum are a key stakeholder for the area and will be involved as this strategy develops.

### **Sustainable Design & Air Quality (SD1, AQ1)**

The Mayor welcomes the draft Plan's focus on protecting the environment and health. However, it is unclear how draft policy on air quality and energy can be implemented on technical grounds and whether this approach would affect the viability of development proposals.

We welcome the forum's continued involvement in the development of the OAPF. If you have any specific questions regarding the comments in this letter please do not hesitate to contact [REDACTED] [REDACTED] on 020 7983 [REDACTED] or at [REDACTED] [london.gov.uk](https://www.london.gov.uk).

Yours sincerely

[REDACTED]

[REDACTED]  
**Chief Planner**

Cc Unmesh Desai, London Assembly Constituency  
 Nicky Gavron, Chair of London Assembly Planning Committee  
 National Planning Casework Unit, DCLG  
 Lucinda Turner, TfL

## Annex 1 - TfL comments

### Draft Isle of Dogs Neighbourhood Plan and Policies, Regulation 16 consultation, London Borough of Tower Hamlets

TfL welcomes the opportunity to comment again on the draft Isle of Dogs Neighbourhood Plan and Policies within LB Tower Hamlets. The following comments represent TfL's view in terms of operational and land use planning / transport policy matters as part of our statutory duties.

It is unfortunate that many of the transport comments highlighted within the previous round of consultation (Regulation 14) have not been reflected within this version of the plan, and therefore many of the comments reiterate these points. The Neighbourhood Plan presents a clear opportunity to draw down policy to the locality and deliver benefits to the area, including particularly those around Healthy Streets.

#### General comments

Evidence	Whilst the plan presents quite a clear narrative in terms of what it wants to achieve, it needs to be grounded in robust evidence. In some areas it strays into anecdotes and a subjective narrative which is not necessarily evidenced in the document or appendices.
London Plan	Since the plan was written the new London Plan has been published, which will supersede much of the evidence presented within the plan, including for instance P14 City in the east and P16 as examples.

#### Isle of Dogs Neighbourhood Plan – Specific comments

P4	PTAL – this is not the standard definition of PTALs and needs to be amended.
P7 Para 2	“somethings have not changed” implies that there is no ongoing investment in infrastructure in the area, which is misleading given things such as for example the delivery of Elizabeth line from 2018. Suggest it is removed.
P26 Para 2 & 3	<p>Since 1999 the DLR was upgraded to three-car operations. This was a significant investment in capacity for the area, including a number of stations being enhanced or rebuilt entirely, in the case of South Quay. Since 1999 the Jubilee line has also been upgraded, with extra carriages also having been added to each train. There has also been investment in cycling, with the delivery of Cycle Hire to the area, as well as Cycle Superhighway 3.</p> <p>The plan does not pick up on the opportunity of Elizabeth line, and we would encourage the plan to consider the benefits this will bring to the area. The Elizabeth line will provide a significant capacity uplift for the area, as well as provide improved connectivity.</p> <p>TfL have been working with LBTH since 2015 to develop new bridge infrastructure across South Dock. Further details on this were announced by the borough in late 2017, with a consultation planned in February 2018. The plan should be updated to reflect the latest situation.</p>

P27 Construction	TfL are proactively working with the borough, as part of the OAPF process, to develop a coordinated approach to construction logistics for the area. The Neighbourhood Forum are a key stakeholder for the area and will be involved as this strategy develops.
P31	<p>The DLR also provides access to/from the north, not just from the south. The plan should present all connectivity benefits for the area, including from Canary Wharf including Jubilee and Elizabeth lines.</p> <p>The Thames Path is only blocked in short sections only.</p> <p>What about future proposals?</p>
P32	<p>All these points need to be directly backed up by evidence.</p> <p>1 – Clarification and expansion is sought on what is meant by this? Does the plan mean to say unable to get on the first bus/train, or station crowding? As part of the OAPF, TfL is investing in enhancements to public transport network, including the delivery of new, more spacious DLR trains, as well as improved frequencies will provide a step-changes in capacity across the DLR network, whilst continued enhancements to the bus network will also enable travel choice and improve bus reliability.</p> <p>2 – The bus improvements did provide a net increase in capacity for the network, including double decking the D8 route. Further work is being undertaken to specifically look at bus priority for the area, as well as further service improvements in the future.</p> <p>20 – Again, the plan should highlight evidence of this reduction. The Thames Clippers RB1 route serves this pier and it is owned by Canal's and Rivers Trust. The OAPF is looking at how the pier could be utilised more effectively to support the area. This includes raising awareness of the pier, the services it could offer, as well as improving local connectivity and legibility for people to access it.</p>
P40	<p>Whilst the aspiration for these objectives is welcomed, how will they be addressed / achieved in practicality?</p> <p>Some of these objectives arguably exist already, so what is the Plan doing over and above this? Again these all need to be directly evidenced.</p> <p>Point 1 – Is the plan highlighting that quick, efficient and free-flowing transport options, that work together, do not exist already? This needs to be more specific.</p> <p>A key principle of the OAPF is to tackle the dominance of traffic, in doing so making the streets better for people, as well as enabling travel choice and options. As part of this we need to consider the movement of people and goods rather than vehicles. We need to create an environment that encourages people to walk and cycle for local journeys, as well as the last mile of longer journeys, and utilise the public transport network effectively.</p>
P41/42	<p>CC1-CC3 - TfL is working with LBTH to develop a coordinated approach to construction management and communication across the Isle of Dogs and South Poplar area, as part of the wider OAPF. We hope to build on this approach to include Delivery and Servicing in a similar fashion.</p> <p>AQ1 - TfL welcomes the principle of a policy on air quality within the Plan. Consideration of this should be broadened from just development to incorporate other areas, for example to shift people to sustainable forms of transport to reduce emissions from vehicles.</p>

P43	Point I - It would be more appropriate to reword this along the lines of a bridge landing point / a pier.
P45	Inconsistency in terms of Alpha Square. Earlier in the plan it highlights that the school had not been secured. Consider rewording to 'committed to deliver'.
P46	It is not just about sites. LBTH's ability to deliver infrastructure on its highway network should be highlighted here, with an aim to deliver Healthy Streets to benefit the community.
P49	'Limited transport networks northwards'. Clarification is sought on what is meant by this?
P50	Whilst the principle behind this may be sensible, this can become very restrictive and not very robust. What happens when different needs arise during the lifespan of the plan?
P52	<p>The OAPF outlines strategies for transport, connectivity, placemaking and delivery for the area. The Neighbourhood Forum has been engaged throughout these processes.</p> <p>There should be a delivery focus to this policy, building on the existing strategies, for instance through feasibility studies, rather than looking to produce further strategies.</p>
P82	<p>We welcome the focus on health and environment as part of the planning process.</p> <p>TfL would welcome consideration of how people travel and the need to create healthier lifestyles by enabling people to walk, cycle and use public transport rather than private vehicles wherever possible.</p> <p>This policy focusses on the air quality and development, but there needs to be a much broader outlook in this policy. For instance it is lacking in terms of car use and car parking for the area.</p> <p>How would this be enforced practically?</p>
P87	<p><u>1 Local Detail</u> This is straying beyond the role of the Neighbourhood Forum. The Forum should look to work collaboratively with the Authorities, such as the local Highway Authority, in order to deliver improvements.</p> <p><u>3 Utilities</u> The OAPF highlights the need for new services in this respect. This should highlight how the Forum should work together with partners to develop ideas for how to avoid roads being repeatedly dug up for works. The Forum should be aware of the costs and disruption associated with engineered alternative solutions. Suggest referring to the OAPF Local Connections Strategy for more information.</p> <p><u>6 Public Realm</u> Refer to the OAPF Placemaking and Local Connections Strategy for the area.</p> <p><u>10 Transport Strategy</u></p>



	<p>A robust and comprehensive transport strategy is being developed for the OAPF. This considers how people travel now and in the future, and works alongside wider strategy and policy documents such as the new Mayor's Transport Strategy, London Plan and LB Tower Hamlets Local Plan. As part of this interventions have been identified to support the highway, public transport, walking and cycling, as well as broader work looking at how to improve local connection corridors. This will be published alongside the OAPF.</p> <p>This should be referred to and the starting point for the Plan. We suggest this is divided up into projects/policies of strategic importance and then local transport elements, which the Forum will be well placed to be involved with. Some areas are out of the scope of this plan to be able to deliver easily, whilst there are a number of quick wins the Plan could work to assist in delivering.</p> <p>In terms of c), TfL would welcome this being renamed to 'crossings' as a series of options continue to be considered as part of ongoing processes and rename as i) Within the area and ii) River Crossings</p> <p><u>16 Design Guide and Planning Policy Guide</u></p> <p>The plan needs to demonstrate why it requires a bespoke design guide for the area, when there are multiple guides already in existence which could be used and referred to instead, including the Local Connections Strategy of the OAPF. We therefore suggest the Plan builds on the existing design guides, where there are established palettes and standards for the area that should be adhered to. If there are specific conditions which are felt to be bespoke to this area then the Plan needs to first identify this need and clearly justify it.</p>
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# GREATER LONDON AUTHORITY

Neighbourhood Planning Consultation  
Strategic Planning – Plan Making  
London Borough of Tower Hamlets  
PO BOX 55739  
London  
E14 2BG

**Department: Planning**

Our reference: LDF30/LDD22/NP02/HA01

Date: 19/02/20 2020

By email: [REDACTED]@isleofdogsforum.org.uk  
CC: [neighbourhoodplanning@towerhamlets.gov.uk](mailto:neighbourhoodplanning@towerhamlets.gov.uk)

Dear Sir/Madam,

**Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012  
The Neighbourhood Planning (General) Regulations 2012**

**RE: Isle of Dogs Neighbourhood Plan (IoDNP) – Regulation 16 Consultation**

Thank you for consulting the Mayor of London on the Isle of Dogs Neighbourhood Plan (IoDNP) (Regulation 16). As you are aware, all Development Plan Documents in London, including Neighbourhood Plans, must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraphs 29 of the National Planning Policy Framework (NPPF) 2018, requires neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the IoDNP includes the London Plan and the recently adopted Tower Hamlet's Local Plan.

The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are included at Annex 1.

This letter sets out where you may need to amend proposed policies and supporting text to be more in line with the current London Plan and the Intend to Publish London Plan. As currently drafted the IoDNP is in general conformity with the Intend to Publish London Plan. However, the Mayor does have concerns that some elements of the proposed neighbourhood plan may have negative impacts on the delivery of the Isle of Dogs and South Poplar Opportunity Area.

**The Intend to Publish London Plan**

As you know, the Mayor published his draft new London Plan for consultation on 1st December 2017. The Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. Publication of the final version of the new London Plan is anticipated in later in the year,

at which point it will form part of Tower Hamlet's Development Plan and contain the most up-to-date policies.

## **General**

Many of the comments made in this response to your consultation repeat and reinforce the Mayor's earlier comments made in response to the Regulation 14 consultation on the Isle of Dogs Neighbourhood Plan.

At the very start the Neighbourhood Plan now includes a map showing clearly and precisely the extent of the IoDNP boundary. This is very welcome but could be accompanied, by contextual analyses, setting out how the Neighbourhood Area relates to Tower Hamlets and further afield in the wider context of London.

More information setting out the neighbourhood plan's relationship with the Isle of Dogs and South Poplar Opportunity Area (Figure 12 in Tower Hamlets Local Plan) and the Northern Isle of Dogs (NloD) which is in the emerging London Plan would be very useful. The Neighbourhood Plan should recognise the significance of the area in terms of its strategic importance within the current and Intend to Publish London Plans in the role it plays in hosting dynamic clusters of world city businesses and other specialist functions which are of national and international importance as set out in current London Plan Policy 2.13 and the Intend to Publish London Plan Policies SD4, E1 and paragraph 1.5.3. The Intend to Publish London Plan, in Table 2.1 sets out indicative guidelines for the Isle of Dogs and South Poplar Opportunity Area which is comprised of 29,000 new homes and 110,000 new jobs.

Officers would like to see more proactive objectives that would help deliver much needed housing across the capital and within the London Borough of Tower Hamlets in accordance with Good Growth objective GG2 Making the best use of land. The Neighbourhood Plan should recognise that Tower Hamlets' housing target has recently decreased from 3,931 to 3,473 homes per annum and ideally the neighbourhood plan should establish how it will positively contribute towards this in agreement with the London Borough of Tower Hamlets.

Northern Isle of Dogs is recognised in the Intend to Publish London Plan as a CAZ satellite location for world city office functions and in Policy S.SG1 of Tower Hamlets Local Plan. While it is geographically separate from the CAZ it is to be treated as a part of the CAZ and relevant Intend to Publish London Plan Policies should apply, including Policy E1, which identifies Northern Isle of Dogs as a strategic location for office development.

## **Infrastructure**

The Isle of Dogs and South Poplar Opportunity Area Planning Framework was adopted on 14 October 2019 and is supported by a raft of evidence including the Isle of Dogs and South Poplar Development Infrastructure Funding Study 2017. The up-to-date study identifies the required infrastructure needed to support plans for growth in the area and acknowledges the funding gap that will need to be addressed. At 35% affordable housing delivery, the study suggests there is a funding gap of £162 million (maximum growth scenario). The draft Neighbourhood Plan's requirement for Infrastructure Impact Assessments is not considered to be a positive and proactive approach and would most likely confirm what has already been evidenced in the study and could ultimately result in the reduced delivery of affordable housing. We will be working with the borough to monitor this to identify ways to close the funding gap over time. However, in this context the requirement set out in Policy D1 could compromise the delivery of the London Plan in relation to this Opportunity Area.

If the policy is retained, we strongly suggest that the threshold is too low and would place an unnecessary burden on development coming forward. We suggest a higher threshold such as developments referable to the Mayor to ensure that only those applications which place a significant burden on the infrastructure already planned through the Opportunity Area Planning Framework process are subject to the requirement.

We also note the Mayor's priorities for affordable housing and infrastructure set out in Part D of Intend to Publish London Plan Policy DF1. It is important that this policy does not compromise delivery of these priorities.

The Mayor welcomes in Section 6 that the IoDNP sets out CIL spending priorities which are largely based on the Isle of Dogs and South Poplar Development Infrastructure Funding Study.

### **Housing/Design**

The sustainable residential quality matrix (SRQ Matrix) which set out appropriate residential densities in locations with various public transport accessibility has been removed from the Intend to Publish London Plan. It is recognised that the matrix formed a basis for design guidance and was rarely adhered to as an upper limit to residential development design proposals. Hence the decision to remove this from the Intend to Publish London Plan and allow Local Authorities and Neighbourhood Area qualifying bodies more control and flexibility about optimising development to make the best use of land. The Intend to Publish London Plan enables boroughs and neighbourhoods to establish how they wish to address development densities through the approach set out in Intend to Publish London Plan Policy D3 Optimising site capacity through the design-led approach.

The IoDNP should recognise that the SRQ Matrix has now been removed from the Intend to Publish London Plan and amend the supporting text in the Neighbourhood Plan accordingly to ensure the neighbourhood plan does not become out of date quickly. Given that the matrix is being deleted and the reasons for this, the Forum may also wish to consider what justification there is for this threshold beyond the London Plan. Footnote 17 of the draft IoDNP makes reference to the Mayor's Housing Supplementary Planning Guidance tests for what is considered to be appropriate circumstances in exceeding the ranges in the density matrix. This reference should be included in draft Policy D2 to be clear that the need to comply with the Mayor's Housing SPG is only in relation to that section of the SPG.

### **Empty sites and air quality**

The IoDNP's intention in Policy ES1, that vacant land be used for community meanwhile uses is welcome and reflects Intend to Publish London Plan Policies SD7, D7 and HC5. The IoDNP is encouraged to explore wider opportunities for other meanwhile uses such as for housing and for food growing as set out in Intend to Publish London Plan Policies H3 and G8.

The Mayor welcomes the IoDNP's approach towards air quality which is in line with the Intend to Publish London Plan Policy SI1.

### **Estate Regeneration**

It is apparent that the forum want to ensure that future estate regeneration is conducted in a fair and consistent manner. However, Policies ER1-ER9 deal with issues that are beyond the

remit of planning and are not considered to be material considerations. This includes policies involving balloting processes for estate regeneration. It should be noted that the Mayor recognises the significance of delivering estate regeneration which takes into account the importance of existing and new residents and communities needs and rights. Therefore, in accordance with paragraph 4.8.4 of the Intend to Publish London Plan estate regeneration the Mayor asks the forum to take account of the requirements of his Good Practice Guide to Estate Regeneration (2018) and recognises that any landlord seeking GLA funding for Estate Regeneration, involving the demolition of social homes shows that residents have supported their proposals through a ballot (see <https://www.london.gov.uk/what-we-do/housing-and-land/improving-quality/estate-regeneration#>).

The Mayor thanks the Isle of Dogs Neighbourhood Forum for giving him the opportunity to respond to this consultation. If you have any specific questions regarding the comments in this letter please do not hesitate to contact [REDACTED] [REDACTED] on 020 7084 [REDACTED] or at [REDACTED] [london.gov.uk](https://www.london.gov.uk).

Yours sincerely



**Director – Built Environment**

Cc Unmesh Desai, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
Lucinda Turner, TfL





## Annex 1 – Transport for London Comments

Plan-Making Team, Strategic Planning  
Tower Hamlets Council  
Town Hall  
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### By Email

13 February 2020

Dear Sir/Madam

### Re: Isle of Dogs Neighbourhood Plan 2019-2031

*Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA).*

Thank you for giving Transport for London (TfL) the opportunity to comment on the draft Isle of Dogs Neighbourhood Plan. Given the advanced stage of the draft London Plan in the adoption process – with the Intend to Publish version now available on the GLA website – we will have regard to it when assessing and responding to local planning policy consultations, including the draft Isle of Dogs Neighbourhood Plan.

Public and active transport infrastructure is vital to support 'good growth' across London, and TfL will continue to work with all partners to ensure that new development in the area covered by the Isle of Dogs Neighbourhood Plan enables and encourages people to travel by walking, cycling and public transport. We strongly welcome the aspiration of the draft Isle of Dogs Neighbourhood Plan to support growth while enabling people to move around using sustainable transport modes.

As set out in our response to an earlier consultation on the draft Neighbourhood Plan, we urge the Forum to include an approach to traffic reduction within the Isle of Dogs Neighbourhood Plan as set out in the Mayor's Transport Strategy (MTS). We further encourage including the Healthy Streets 'wheel' (see Appendix B) in the Neighbourhood Plan to fully embed the Healthy Streets Approach into planning decisions in the area.

We have set out detailed comments and proposed changes in Appendix A to this letter, which we hope are helpful. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the Forum, London Borough of Tower Hamlets and the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth.

Yours sincerely

  
**Manager London Plan and Planning Obligations**


## Appendix A: Specific suggested edits and comments from TfL on the Isle of Dogs Neighbourhood Plan

Section	Page	Track change/comment
2.8.9	7	<p>'Quick, efficient and free-flowing transport options – whether cycling, walking, buses, DLR, boats or cars – all working together effectively.'</p> <p>'Free-flowing' transport is not always possible given the necessary interaction of different road users and the need to manage traffic and congestion, nor is it in line with current policy. We suggest amending this objective to reflect Vision Zero and the Healthy Streets Approach as set out in the draft London Plan and the Mayor's Transport Strategy. Demand management measures are needed to reduce car use in particular as space efficient modes are necessary to effectively move people and goods in high density, urban environments such as the Isle of Dogs.</p>
4.4.2.2	15	<p>The policy needs clarification with regard to the definition of 'sufficient infrastructure capacity', to support new development.</p> <p>It is appropriate to plan for the impact of cumulative development. However, clarification should be given on how mitigation of cumulative impact is proposed to be shared among each development/applicant.</p>
4.4.2.4	15	<p>Please amend text:</p> <p>'If the proposed development is contingent on the provision of new <b>or enhanced</b> Infrastructure (including, without limitation, public transport services), the development should be phased accordingly.'</p>

Section	Page	Track change/comment
4.4.2.5	15	<p>'Infrastructure impacts will be considered unacceptable where they result in negative impacts that cannot be adequately mitigated.'</p> <p>We request clarity on what is considered 'adequate' mitigation. As part of this, opportunities to enable walking and cycling should be considered to support the public transport network, in line with the draft London Plan and Mayors Transport Strategy.</p>



## Appendix B: Healthy Streets Wheel



Source: Lucy Saunders



**From:** [REDACTED]  
**To:** ["planning.policy@walthamforest.gov.uk"](mailto:planning.policy@walthamforest.gov.uk)  
**Cc:** [REDACTED]  
**Subject:** Highams Park Neighbourhood Plan - GLA officer  
**Date:** 17 February 2019 17:35:00

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Dear Sir/Madam

Thank you for consulting the Mayor of London on the Submission version of the Highams Park Neighbourhood Plan. As you are aware, all Development Plan Documents in London, including neighbourhood plans must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004. Paragraph 29 of the National Planning Policy Framework (NPPF) 2018, also requires neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the Highams Park Neighbourhood Area includes the London Plan and the Waltham Forest Local Plan.

### **The draft new London Plan**

The Mayor published his draft new London Plan for consultation on 1<sup>st</sup> December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan commenced on 15 January 2019 and publication is anticipated in Winter 2019/20. Once published, the new London Plan will form part of Waltham Forest's and the neighbourhood forum's Development Plan and contain the most up-to-date policies. The Highams Park Neighbourhood Plan is required to be in general conformity with the current London Plan, however any policies that diverge from the draft new London Plan will become out of date as the draft new London Plan gains more weight as it moves towards publication. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Plan's references to the London Plan.

### **General**

Neighbourhood planning provides communities the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years. It is about enabling rather than restricting development and a neighbourhood plan should show how it contributes towards sustainable development. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development.

Officers welcome the overall objectives in the draft Highams Park Neighbourhood Plan, however the approach to industrial land is not in general conformity with the London Plan.

### **Business, Commercial and Employment Sites**

GLA officers welcome the Neighbourhood Plan's ambitions to protect business floorspace and employment sites, however the approaches set out in proposed Policy BED1 are not in conformity with the London Plan and the draft new London Plan and are considered premature as borough-wide evidence is being prepared on the demand for industrial capacity.

London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as

contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system.

Industrial land and floorspace provide the capacity for the activities described above to operate effectively. One of the industrial land uses in greatest demand is storage and logistics / distribution (CAG Consulting, London Industrial Land Demand Study, GLA 2017) and therefore the Neighbourhood Plan should not limit potential B8 floorspace in London.

Whilst the existing and draft London Plans seek to protect industrial capacity, they acknowledge the potential for the introduction of residential use. An approach to co-location with housing is detailed in draft new London Plan policy E7. It is for Waltham Forest through its Local Plan process to assess its industrial areas, including Locally Significant Industrial Sites (draft London plan policy E6) and determine which areas are most appropriate for retention, intensification and release or co-location and the most suitable types of industrial uses to be provided based on need. This borough wide approach cannot be undermined by the Neighbourhood Plan.

In line with draft new London Plan policy E1, new office floorspace should be directed to town centres.

### **Highams Park District Centre**

Draft policy BED2 should be clear that additional residential development is supported in the district centre in line with draft London Plan policy SD8.

### **Affordable Housing**

The Neighbourhood Plan should note that 50% is a strategic affordable housing target and the London Plan (draft policy H6) and Waltham Forest's Affordable Housing and Viability Supplementary Planning Document include the threshold approach which seeks a minimum of 35% affordable housing or 50% on public land or where industrial capacity is lost, otherwise a viability assessment must be submitted.

### **Housing space standards**

Draft Neighbourhood Plan policy HDA2 seeks to ensure all new residential units are at least 50sqm in size. It should be noted that in accordance with London Plan policy 3.5 (and draft policy D4) and the National Space Standards the minimum threshold is 39sqm.

### **Open space and Green Infrastructure**

Officers welcome the requirements to protect and enhance open spaces, green infrastructure and biodiversity. The draft new London Plan seeks a net gain in biodiversity and includes a policy on urban greening.

I hope you have found these comments helpful to inform the Highams Park Neighbourhood Plan. If required, the Mayor will provide formal comments on any further round of consultation. If you would like to discuss any comments in this letter please contact me at this email or on 020 7983 [REDACTED]

regards

[REDACTED] [REDACTED]

**Team Leader – Local Plans**  
**London Plan and Growth Strategies Team**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA  
020 7983 [REDACTED]

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[REDACTED] [london.gov.uk](https://www.london.gov.uk)

**From:** [REDACTED]  
**To:** [REDACTED]@forsters.co.uk"  
**Cc:** [REDACTED]  
**Subject:** Draft Mayfair Neighbourhood Plan  
**Date:** 28 October 2016 15:36:09

---

Dear Alice

Thank you for consulting the Mayor on the draft Mayfair Neighbourhood Plan.

Given our limited resources, the GLA has to focus on responding to Local Plan documents and only review Local SPDs and Neighbourhood Plans where we know there are strategic issues of concern.

**Please note** that the following is an officer response only:

- In broad terms, national Planning Practice Guidance sets out that Neighbourhood Planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next ten, fifteen and twenty years in ways that meet identified local need and make sense for local people
- The Mayfair Neighbourhood Area is within the Central Activities Zone (CAZ) and the draft Mayfair Neighbourhood Plan should acknowledge London Plan policies 2.10 and 2.11 which seek to enhance and promote the strategic functions of the CAZ, whilst setting out a local approach for predominantly local activities in the CAZ, in line with London Plan policy 2.12
- The London Plan also seeks an increment to housing provision through mixed use development providing this does not compromise the CAZ's strategic functions. In this regard the draft Mayfair Neighbourhood Plan should state how the area will contribute to London and Westminster's housing target as well as the wider functions of the CAZ
- The Mayor welcomes the proactive format the policies are draft in
- The Mayor welcomes the protection for existing housing and encouragement of additional housing in the area, as long as this doesn't undermine the overall functions of the CAZ

I trust the above is useful.

Please feel free to contact me should you wish to discuss any of the above comments in more detail.

Kind regards

[REDACTED]  
*London Plan Team*  
*Greater London Authority*  
*Tel: 020 7983* [REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED] [@pimlicoforum.org](mailto:[REDACTED]@pimlicoforum.org)  
**Subject:** GLA Officer's Response Pimlico Neighbourhood Plan – Pre-submission (Reg 14) Consultation  
**Date:** 10 October 2019 14:12:00

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Dear [REDACTED]

Thank you for consulting the Mayor of London on the Pre-Submission version of the Pimlico Neighbourhood Plan (PNP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2018, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Pimlico Neighbourhood Area includes the London Plan and the Westminster City Plan and includes the new emerging draft Westminster City Plan 2019-2040.

### **The Draft New London Plan**

As you are aware, the Mayor published his Draft London Plan for consultation on 1st December 2017 and the Draft London Plan consolidated suggested changes (following examination hearings) on 16 July 2019. Publication of the final version is anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Westminster and the neighbourhood forum's Development Plan and contain the most up-to-date policies. Given the timing, the neighbourhood plan will need to be in general conformity with the new London Plan. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Neighbourhood Plan's reference to the published and draft new London Plans.

The Pimlico Neighbourhood Plan is in general conformity with the current and emerging London Plans and the Officer's response below is guidance which should be followed to improve the emerging neighbourhood plan and align it more closely with the draft new London Plan.

### **General**

The extent of the neighbourhood plan area is set out clearly and precisely at the very start and this is welcomed by Officers. It appears that the Neighbourhood Areas falls entirely outside the Victoria Opportunity Area, but this should be confirmed on a map showing the context that the neighbourhood forum area is in.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it positively contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. While Officers consider that the Neighbourhood Plan would positively contribute towards



achieving some elements of sustainable development, it should help contribute more positively and proactively towards the implementation of the emerging Westminster City Plan and the London Plan in meeting the borough's growth needs. Such an approach is one which recognises and reflects Westminster's annual housing target, as set out in the borough's draft Local Plan for the delivery of 1,495 new homes a year (for the first 10 years) and to provide capacity for 63,000 new jobs up to 2040. The PNP is encouraged to identify and allocate sites, especially small sites to support the delivery of this established need over the plan period.

New updated national guidance on neighbourhood planning has been published recently and should be taken into account by the neighbourhood forum. New paragraphs 100-106 of the National Planning Guidance now set out information on housing requirement figures, making it clear that an indicative housing requirement figure can be requested by a neighbourhood planning body based on local authority's local housing need as a starting point. If Westminster Council is unable to provide a housing requirement figure, or set out an indicative one, the Neighbourhood Forum should instead consider using the [neighbourhood planning toolkit on housing needs assessment](#) for this purpose.

## **Context**

The neighbourhood plan should give more recognition and positively responds to its location within the Central Activities Zone (CAZ). Within this strategic policy, the document can then recognise that it is a predominantly residential areas within the CAZ in line with draft London Plan policy SD4K

## **PIM 16 Hotels and short term let properties**

Whilst visitor infrastructure, including hotels is supported in the CAZ, draft London Plan policy E10 there is an exception for predominantly residential neighbourhoods and wholly residential streets.

## **Green and Open spaces**

Officers welcome the policies that seek to protect open space and improve access to these spaces.

## **Renewable Energy**

Officers welcome the proposed policy on renewable energy. The plan should refer to the Mayor's policies on climate change and specifically the carbon reduction targets set out in draft London Plan policy SI2 and the Mayor's ambition for London to be a zero carbon city by 2050.

## **PIM24 – Major development sites**

The text on Major development sites should acknowledge that the sites will be in the CAZ and therefore should make an appropriate contribution to accommodating London's and Westminster's growth.

With regards to draft policy PIM24Da, the type of commercial floorspace should be provided in line with local evidence. Draft policy PIM24De should reflect that the site is in the CAZ and adjacent to an Opportunity Area, which is home to the largest proportion of London's Grade A office space. Residential development should not be excluded from this site as it could contribute to meeting Westminster's new housing target of 1,495 new homes a year (for the first 10 years).

### **CIL and S106**

Officers welcome that the Neighbourhood Forum has set out its priority for CIL receipts and S106 agreements.

I hope you have found these comments helpful to inform the next version of the Pimlico Neighbourhood Plan. If you would like to discuss any comments in this letter please contact me, [REDACTED] [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

Regards

[REDACTED]

[REDACTED] [REDACTED]

**Team Leader – Local Plans**  
**London Plan and Growth Strategies Team**  
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020 7983 [REDACTED]

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**From:** [REDACTED]  
**To:** [REDACTED]@planforsoho.org; [REDACTED]t@planforsoho.org  
**Cc:** [REDACTED]  
**Subject:** GLA Officer's Response Soho Neighbourhood Plan – Pre-submission (Reg 14) Consultation  
**Date:** 11 September 2019 15:45:00

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Dear [REDACTED]

Thank you for consulting the Mayor of London on the Pre-Submission version of the Soho Neighbourhood Plan (SNP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2018, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Soho Neighbourhood Area includes the London Plan and the Westminster City Plan and includes the new emerging draft Westminster City Plan 2019-2040.

### **The Draft New London Plan**

As you are aware, the Mayor published his Draft London Plan for consultation on 1st December 2017 and the Draft London Plan consolidated suggested changes (following examination hearings) on 16 July 2019. Publication of the final version is anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Westminster and the neighbourhood forum's Development Plan and contain the most up-to-date policies. Given the timing, it is likely that the neighbourhood plan will need to be in general conformity with the new London Plan. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Neighbourhood Plan's reference to the published and draft new London Plans.

The Soho Neighbourhood Plan is in general conformity with the current and emerging London Plans and the Officer's response below is guidance which should be followed to improve the emerging neighbourhood plan and align it more closely with the draft new London Plan.

### **General**

The extent of the neighbourhood plan area is set out clearly and precisely at the very start and this is welcomed by Officers. A finer grain map would be useful to ensure that where the edge of the neighbourhood area does not follow a road it is clear which land is contained within the established boundary. The objectives of the Soho Neighbourhood Plan (SNP) are set out clearly at paragraph 5.2 and the fact that they are the clear result of earlier consultation and community engagement is very welcome.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it positively contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. While Officers consider that the Neighbourhood Plan would positively contribute towards achieving some elements of sustainable development, it should help contribute more

positively and proactively towards the implementation of the emerging Westminster City Plan and the London Plan in meeting the borough's growth needs. Such an approach is one which recognises and reflects Westminster's annual housing target, as set out in the borough's draft Local Plan for the delivery of 1,495 new homes a year (for the first 10 years) and to provide capacity for 63,000 new jobs up to 2040. The SNP is encouraged to identify and allocate sites, especially small sites to support the delivery of this established need over the plan period.

New updated national guidance on neighbourhood planning has been published recently and should be taken into account by the neighbourhood forum. New paragraphs 100-106 of the National Planning Guidance now set out information on housing requirement figures, making it clear that an indicative housing requirement figure can be requested by a neighbourhood planning body based on local authority's local housing need as a starting point. If Westminster Council is unable to provide a housing requirement figure, or set out an indicative one, the Neighbourhood Forum should instead consider using the [neighbourhood planning toolkit on housing needs assessment](#) for this purpose.

### **Context**

The Tottenham Court Road Opportunity Area (OA) occupies some parts of the north east corner of the neighbourhood area and this should be illustrated clearly in the draft SNP. The OA forms an important contextual element of the SNP and the draft new London Plan sets indicative targets to deliver 300 new homes and 6,000 new jobs for the period to 2041 in Table 2.1. The OA is a result of the Tottenham Court Road underground station becoming part of the Elizabeth Line. The SNP should set out how it will positively contribute to achieving the OA indicative targets and should not put in place overly restrictive policies that would unnecessarily hinder the delivery of this growth.

The neighbourhood plan recognises and positively responds to its location within the Central Activities Zone (CAZ). However, the SNP should promote the introduction of office, culture, arts, entertainment, night-time economy, tourism development and those uses listed in paragraph 2.4.4 and in accordance with draft new London Plan Policy SD4K prior to the consideration of new homes through mixed use development. In addition, the SNP's aim should be to enhance and conserve the quality and character of predominantly residential areas, following paragraph 2.4.5 of the draft new London Plan which states that new residential development should be complimentary and not compromise the strategic functions of the CAZ with special regard for other designations including those for the West End Retail and Leisure Special Policy Area (WERLSPA), Soho Special Policy Area and West End International Centre.

It is noted and welcomed that the SNP supports the new Special Policy Area designation for Soho as set out in the draft Westminster City Plan. The Mayor, in his response to the most recent Westminster City Plan consultation showed his support for the creation of the Soho SPA, and officers also welcome the neighbourhood plan's positive support for this too.

The SNP recognises that the area almost completely sits within the WERLSPA and should recognise that the area also overlaps with the West End International Centre designation.

Both these designations further limit the area's ability to accommodate new residential development without compromising the strategic priorities set out earlier and this should be taken on board. In fact, the SNP should note and reinforce that residential uses in the West End International Centre are not supported in the emerging Westminster City Plan 2019-2040.

The strategic functions of the CAZ should be promoted and supported in the Soho neighbourhood area, including those for new music venues and the night-time economy to reflect the approach set out in draft new London Plan Policy HC6, which in turn, should avoid any harmful impacts on nearby established residential areas through the agent of change principle in accordance with draft new London Plan Policy D12.

In accordance with paragraph 7.5.4 of the draft new London Plan the SNP should recognise how the cultural offer in Soho serves and plays such an important role for the LGBT+ community and should seek to protect and enhance related facilities, especially those used in the evening and night time and illustrated in the [Mayor's Cultural Infrastructure Map](#). In addition, the SNP is encouraged to promote the [Mayor's LGBTQ+ Venues Charter](#) in order to support these types of venue.

### **Tall buildings**

Tall buildings are defined in the SNP as those substantially taller than their surroundings, but Policy 2 fails to satisfy the conditions set out in draft new London Plan Policies D6 and D8 which promote a design-led approach to optimise the development of land including the introduction of tall buildings where this type of development is considered appropriate. It is understood that the vast majority of the neighbourhood is designated as Conservation Area, but this in itself will not preclude a restriction on taller buildings being introduced into some parts of the area where they might be more appropriately accommodated, especially in areas close to excellent transport nodes, including the future Elizabeth Line station at Tottenham Court Road. The SNP should endeavour to identify specific areas suitable for taller buildings, setting appropriate threshold heights within them in line with the emerging Westminster City Plan or based on local evidence that takes into account the area's historic assets and strategic viewing corridors. The current proposed approach which essentially imposes a blanket restriction on development which substantially exceeds existing prevailing heights (in the absence of a definition) could severely limit opportunities to bring forward development and would also inhibit the operation of the presumption in favour of small housing development and this would not be supported by the Mayor.

What constitutes 'tall building' is defined in Westminster's draft City Plan 2040 as buildings greater than 30m in height, which in turn, reflects the definition set out in Policy D8 of the draft new London Plan and should be referenced and/or reinforced in the neighbourhood plan.

### **Other matters**

While officers are strongly supportive of the SNP's intention that the Brewer and Poland Street Public car parks be earmarked for the redevelopment as micro-consolidation centres, the intention to safeguard the sites as car parks for a minimum period of five



years is not supported. This approach will continue to promote and encourage car generated journeys into this part of London. Micro-consolidation centres would support the functioning of the CAZ by providing capacity for industry and logistics for last mile distribution by foot and cycle to support businesses and activities within the local area in accordance with draft new London Plan Policy SD4M. Officers strongly encourage the SNP to allocate these sites for an appropriate land use, which would include suitably sized micro-consolidation centres.

Officers welcome that the SNP intends to limit the size of dwellings to no more than 138 sqm in order to optimise the use of land for residential development which goes beyond the limit in the emerging Westminster City Plan. The SNP is also encouraged to promote the presumption in favour of small sites development for residential uses as a means of increasing housing numbers without incurring a loss of other uses through, for example, of the conversion of larger dwellings and/or the extension of others. The SNP is encouraged to develop design codes to promote small housing site development in accordance with Policy H2AB of the draft new London Plan.

The neighbourhood plan's aspiration to improve air quality is very welcome. The SNPs approach could go further in reflecting and promoting the approach in the draft new London Plan, which promotes an air quality positive approach in the CAZ in Policy SD4 and also includes measures to address the urban heat island effect and other climate change related issues.

## Glossary

Affordable housing – the definition in the Mayor's Affordable Housing and Viability Supplementary Planning Guidance should be used. The current description in the glossary should be amended to include intermediate housing also. Reference to the Mayor's preferred genuinely affordable housing tenures set out in paragraphs 4.7.3-4.7.9 of the draft new London Plan is encouraged.

Central Activities Zone – the glossary should refer back to draft new London Plan Policy SD4 which defines the CAZ and its functions.

I hope you have found these comments helpful to inform the next version of the Soho Neighbourhood Plan. If you would like to discuss any comments in this letter please contact me, [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk).

Regards

[REDACTED]

**Senior Strategic Planner, London Plan Team**  
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**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

[REDACTED]  
Knightsbridge Neighbourhood Forum  
[REDACTED]

**Our ref:** LDF33/LDD36/B5

**Date:** 23 February 2017

**Sent via email to** [REDACTED]@knightsbridgeforum.org

Dear [REDACTED]

**Re: Knightsbridge Neighbourhood Plan Pre-submission Consultation**

Thank you for consulting the GLA on the Knightsbridge Pre-submission Neighbourhood Plan. As you are aware, all Local Development Plan Documents in London including neighbourhood plans have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 184 of the NPPF also requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. The Local Plan for the Knightsbridge Neighbourhood includes all the Development Plan Documents (DPD) adopted by Westminster Council and the London Plan.

The Knightsbridge Neighbourhood Plan (KNP) is welcomed, particularly for the way in which it seeks to ensure policies are in general conformity with some of those in the London Plan and Westminster City Plan. The conformity references below each policy are particularly helpful.

**Neighbourhood Plans**

Neighbourhood planning is about enabling rather than restricting development and a neighbourhood plan should show how it contributes towards sustainable development. Overly restrictive policies can prevent development and are contrary to the National Planning Policy Framework (NPPF) which has a presumption in favour of sustainable development (NPPF paragraph 14). The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. In this context, the KNP should set out a positive vision for promoting growth and show how it will help meet the strategic needs of both the Westminster City Plan and London Plan.

**Strategic Context**

In broad terms the KNP appears to draw on the protective policies of the development plan for the area (the Westminster City Plan and the London Plan), but does not seem to address those designed to accommodate growth to the same extent. It would be useful if the statutory relationship between the KNP and Local Development Plan, which includes both the Westminster City Plan and the London Plan, was clarified. For example, paragraphs ii.20 could include the statutory requirement for neighbourhood plans to be in general conformity with the development plan. If the KNP is not to address some of the development plan's policies, it is suggested that guidance be provided for the user specifying where this is the case, and an indication given as to those in the development plan which should also be taken into account within the Neighbourhood.

## **Central Activities Zone and other designations**

The Knightsbridge Neighbourhood Area is located within the Central Activities Zone (CAZ), a London Plan designation. Although reference is made to the CAZ and London Plan Policies 2.10 and 2.11, the London Plan requirement to seek to enhance and promote the strategic functions of the CAZ is not acknowledged. It would be helpful to include an explanation of the role and function of the CAZ and how it relates to the Knightsbridge Neighbourhood Area.

London Plan Policy 2.11 refers to the strategic functions of the CAZ and this includes at A (e) the need to “recognise, improve and manage the country’s largest concentration of night time economies in Soho/Covent Garden as well as other strategic clusters in and around CAZ in line with Policy 4.6”. The KNP includes an area that is designated in the London Plan as both an International retail centre and a Regional/Sub-regional Night Time economy cluster (Table A2.1). The KNP should take account of these important designations.

## **Policy KBR17: Neighbourhood Stress Area**

The London Plan designations bear on proposed Policy KBR 17: Neighbourhood Stress Area. The KNP should look at ways to reconcile this proposal with strategic policy for the CAZ. The proposed Stress Area is situated within a designated retail centre of International importance, within a Night Time economy cluster of regional/sub-regional importance and includes within its boundary a part of one of London’s most renowned shopping streets. The Forum’s proposed area is also not promoted in the Westminster City Plan as a stress area.

The concerns of local residents are understood and it is important to strike the right balance between the needs of local residents and the strategic priorities and functions of the CAZ. London Plan Policy 2.12 recognises the need to develop sensitive mixed use policies in predominantly residential neighbourhoods within the CAZ. This is to ensure housing does not compromise CAZ strategic functions while also recognising how these functions can impinge on local residential amenity. As mentioned above, London Plan Policy 2.11 A (e) supports night time activities in the Knightsbridge area in line with London Plan Policy 4.6 but Policy KBR 17 as currently worded presents a potential conformity issue with strategic policy. The KNP does not advance compelling evidence that local circumstances justify a significant departure from London Plan policy for this strategically distinct part of central London.

A more positive approach could be to draw on the London Plan’s policy (4.6 C (e) and (f)) to manage night time and other uses in the area. This policy sets out ways to address the opportunities and challenges of the night time economy through an integrated range of measures including licensing, policing and transport.

The Forum may wish to draw on the Mayor’s forthcoming draft Supplementary Planning Guidance (SPG) on Night Time Culture, and in particular suggestions on how the ‘Agent of Change’ principle might be applied. This principle was set out in the Government’s recent Housing White Paper and resonates with the London Plan’s existing policy on noise (7.15) and its Supplementary Planning Guidance on the Central Activities Zone.

## **Protection of Public Houses**

Policy KBR23: Protection of Public Houses is in line with London Plan policy providing it is supported by evidence. To provide strategic support for its position the KNP could also draw on London Plan Policy 4.8 which takes a proactive approach to preventing the loss of valued community assets such as public houses.

## **Housing**

It is noted that the Forum has sought to address earlier informal advice to set out what type of housing is required in the area and how this will be achieved through Policy KBR29. The policy also provides support for major residential development and makes reference to Westminster's housing market assessment, which is welcomed. However there is no explicit reference to how the KNP will help Westminster meet and exceed its housing targets.

Proposed Policy KBR30 is supported in principle in that it seeks to increase the number of residential units and discourage loss of units through reconfiguration of residential buildings. Reference could also be made to London Plan Policy 3.14 which seeks to resist the loss of existing housing.

## **Appendix D: Scales of Development**

The proposed different levels relating to scale of development could cause confusion as these are different to the statutory definitions of 'major' or 'minor' development.

If you would like to discuss any of the representations in more detail, please contact [REDACTED]  
[REDACTED]@london.gov.uk).

Yours sincerely,

[REDACTED]

**Strategic Planning Manager**

cc Tony Devenish, London Assembly Constituency Member and Chair of London Assembly  
Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL



**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

[REDACTED]  
Place and Investment Policy Manager  
Westminster City Council  
6<sup>th</sup> Floor  
5, The Strand  
London WC2N 5HR

**Our ref:** LDF33/LDD36/BS

**Date:** 14 February 2018

**Sent via email** to [neighbourhoodplanning@westminster.gov.uk](mailto:neighbourhoodplanning@westminster.gov.uk)

Dear [REDACTED]

**Re: Knightsbridge Neighbourhood Plan Submission Consultation**

Thank you for consulting the Mayor of London on the Knightsbridge Neighbourhood Plan Submission version. As you are aware, all Development Plan Documents in London including neighbourhood plans must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 184 of the NPPF also requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. The Development Plan for the Knightsbridge Neighbourhood Area includes the London Plan, the Westminster City Plan and all the Development Plan Documents (DPD) adopted by Westminster Council.

The GLA provided comment on the pre-submission version of the Knightsbridge Neighbourhood Plan in a letter dated 23 February 2017 sent to Simon Birkett, Chair of the Knightsbridge Neighbourhood Forum.

The Mayor is of the opinion that the Knightsbridge Neighbourhood Plan is in conformity with the London Plan. The Mayor has delegated authority to me to respond on his behalf and his representations are set out below. TfL's comments, which I endorse, are attached as Annex 1.

**The London Plan**

You will be aware that the Mayor published his draft London Plan for consultation on 1<sup>st</sup> December 2017. It is anticipated that the Examination in Public of the draft London Plan will take place in the Autumn 2018 with publication in Autumn 2019. Once published, the new London Plan will form part of Westminster's Development Plan and contain, where relevant, the most up-to-date policies. The Knightsbridge Neighbourhood Plan (KNP) is required to be in general conformity with both the Westminster's City Plan as well as the current London Plan, however its policies will need to be considered alongside the draft London Plan. The draft London Plan is a material consideration in planning decisions, and gains weight as it moves towards publication.

The Mayor recognises that the KNP is at submission stage and the draft KNP was prepared prior to the publication of the draft London Plan. In light of this, the Knightsbridge Neighbourhood Forum should consider whether an early review of the KNP is required to take account of any changes to strategic policies in the draft London Plan that affect the Knightsbridge Neighbourhood Area, such as the Central Activities Zone, Town Centres and housing delivery.



## Neighbourhood Plans

Neighbourhood planning is about enabling rather than restricting development and a neighbourhood plan should show how it contributes towards sustainable development. Overly restrictive policies can prevent development and are contrary to the National Planning Policy Framework (NPPF) which has a presumption in favour of sustainable development (NPPF paragraph 14). The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. It is felt that the KNP could go further in setting a clear positive vision for promoting growth in the Plan area and to help meet the strategic needs of both the Westminster City Plan and the London Plan.

## General comment

The Mayor is pleased to see that his detailed comments made at the pre-submission stage have been considered and issues regarding the Central Activities Zone in particular, have been addressed.

## Housing

Proposed Policy KBR24: Residential Mix including to support local workers and students is welcomed, particularly its support for accommodation to meet the needs of students and employees studying and working in the area. However, in our previous letter, we raised the issue that there was no explicit reference to how the KNP will help Westminster meet and exceed its London Plan housing target of 1,068 units per annum. The potential to deliver additional housing should be explored.

The draft London Plan includes a new housing target for delivering housing through small sites (below 0.25 hectares). Westminster's small sites completions 10-year target is 5,290 or 529 per annum. The KNP could potentially meet a proportion of this target.

## Urban Greening

The inclusion of proposed Policy KBR11: Urban Greening is welcomed, particularly for enhancing biodiversity and mitigating the urban island heat effect.

## Policy KBR16: Night-time and early morning uses in or adjacent to residential areas

This policy could be written more clearly. It is not clear whether there is a distinction between "the amenity of residents..." in A. a. and "environmental amenity" in A. b. It is also unclear what is meant by "demonstrating that individually and cumulatively there are no significant adverse effects on...c. cumulative impacts...".

## Protection of public houses

Proposed Policy KBR19: Protection of public houses is welcomed and is in line with the London Plan Policy 4.8 Supporting a successful and diverse retail sector and related facilities and services, and paragraphs 4.48 and 4.48A the latter which refers to the important role that London's public houses can play in the social fabric of communities. In addition, the KNP pubs policy is aligned with the draft new London Plan Policy HC7 Protecting public houses.

## Office Uses

Proposed Policy KBR21: office uses is supported particularly as the Plan area is located within the CAZ where office uses should be protected. Draft London Plan Policy E1 Offices requires boroughs to consult upon and introduce Article 4 Directions to ensure viable office locations are not

undermined by office to residential permitted development rights and therefore part D) of the proposed policy is welcomed.

### **Air Quality**

The Mayor supports the objectives of the KNP to improve air quality as this is a priority for him. The Mayor has set out his approach to improving air quality in his draft London Plan and draft London Environment Strategy.

Some of the wording of proposed Policy KBR35: Healthy Air could be clearer, particularly references to environmental standards in part B and what is expected from developers in part F. It should be noted that in line with the NPPF, policies must be deliverable over the plan period.

If you would like to discuss any of the representations in more detail, please contact [REDACTED]  
[REDACTED]@london.gov.uk).

Yours sincerely

[REDACTED]

**Chief Planner**

cc Tony Devenish, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL

## Annex 1

### Transport for London (TfL) comments

#### Page 21 POLICY KBR2: COMMERCIAL FRONTAGES, SIGNAGE AND LIGHTING

Support policy h. (signage on the public pavement). Signs/advert boards placed on the highway can cause obstruction to pedestrians and wheelchair users.

#### Page 22 POLICY KBR4: PUBLIC REALM AND HERITAGE FEATURES

Welcome the citation of TfL Streetscape Guidance and inclusion of a hyperlink to the Streets Toolkit.

#### Page 26 POLICY KBR8: PEDESTRIAN MOVEMENT ALONG, ACROSS AND ADJACENT TO MAIN ROADS

Welcome the acknowledgement of TfL as highway/approval authority for the major roads in the Neighbourhood Area.

#### Page 27 POLICY KBR9: ADVERTISING

Welcome specific policy support for controlling advertising, including on phone kiosks, where it would obstruct pedestrian routes. This is a particular issue in central London.

#### Page 34 POLICY KBR14: THE HYDE PARK BARRACKS LAND

Welcome the requirement that car parking for residential use should *'aim for significantly less than one space per unit'*. However, suggest this goes further to specifically support 'car-free' (bar Blue Badge) development. This is in line with emerging draft new London Plan policy, would support policies elsewhere in the plan that seek to reduce traffic congestion and improve air quality, and would be more consistent with Policy KBR 31 A (motor vehicle use).

#### Pages 55/56 POLICY KBR28: ENABLING ACTIVE TRAVEL/POLICY KBR29: PEDESTRIANS WITHIN THE MOVEMENT HIERARCHY

Support these policies, which are in line with the Mayor's 'Healthy Streets Approach'.

#### Page 56 POLICY KBR31: MOTOR VEHICLE USE

Support the encouragement of car free (bar Blue Badge) development and freight consolidation. As the draft Plan points out elsewhere, congestion, particularly on the major road network, is a key issue. Car free development is clearly desirable so as not to exacerbate this.

#### Page 60 POLICY KBR32: ELECTRIC VEHICLE INFRASTRUCTURE

Part C mentions 'electric cycle hire'. No such scheme currently exists yet in London, so perhaps the supporting text could clarify this policy?

#### Page 87 Appendix C — Knightsbridge construction standards and procedures C3.3

Welcome the requirement for construction vehicles to be Silver or Gold level Fleet Operator Recognition Scheme (FORS) accredited, and to have the latest applicable Direct Vision Standard. High levels of cycling and pedestrian activity in the area means that construction vehicle safety is a key consideration.

#### Page 91 Appendix D — Walking and cycling priorities and projects

D2.0 a. mentions Superhighway CS10. The cycle superhighway along South Carriage Drive, which has already been implemented, is the East-West Cycle Superhighway, or CS3. CS10 no longer exists as a named project on the TfL website.



# GREATER LONDON AUTHORITY

## Development, Enterprise and Environment

**Mayfair Neighbourhood Forum**

Email: [REDACTED]@mayfairforum.org

**Our ref:** LDF33/LDD37/BS

**Date:** 7 August 2017

Dear [REDACTED]

### **Re: Mayfair Neighbourhood Plan 2018 - 2038**

Thank you for consulting the Mayor of London on the Mayfair Neighbourhood Plan 2018 - 2038. As you are aware, all Local Development Plan Documents in London including neighbourhood plans have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraph 184 of the NPPF also requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. The Local Plan for the Mayfair Neighbourhood Area includes all the Development Plan Documents (DPD) adopted by Westminster City Council and the London Plan. The Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London have been sent to you under separate cover.

The Mayfair Neighbourhood Plan (MNP) has responded to a number of matters raised during the earlier consultation stage (office response by email dated 28 October 2016) and it is my opinion that the MNP is in general conformity with the London Plan. However, I set out below some suggestions and other representations which are intended to clarify and improve policy areas.

In general the Mayfair Neighbourhood Plan (MNP) is welcomed as a positively prepared plan that seeks to balance the needs of local residents with those of its role as a major employment area, international retail destination and as part of the Central Activities Zone (CAZ). The MNP recognises its role in helping to deliver sustainable growth as part of Westminster and the wider London area, particularly in response to the opening of Crossrail and the increase in the number of people entering the area.

As a general point, it would be useful to number figures/maps so they can be more easily referred to in the text of the document.

#### **Central Activities Zone**

I am pleased to see that the MNP makes reference to the London Plan Central Activities Zone (CAZ) policies and promotes the strategic functions of the CAZ in a positive way. As suggested previously, it might be useful to acknowledge the London Plan CAZ policies 2.10, 2.11 and 2.12 more explicitly.

#### **Growth**

The commitment to increasing density, intensity of use, efficient use of existing floorspace and promotion of mixed use development is welcomed and is in line with emerging London Plan policies.

### **'Huts' definition**

Policy MR1.6 refers to stand alone retail 'huts'. It would be useful to have a clearer definition of the retail huts referred to and an explanation as to whether or not they require planning permission and/or licensing to operate.

### **Commercial**

The protection and encouragement of office space in Central and East Mayfair is welcomed.

### **Shepherd Market**

It appears that Policy MSM is a type of 'special policy area' similar to Savile Row. The Mayor is keen to promote London as a 24 hour city, particularly in areas such as the CAZ and strategic clusters of night time activity (see London Plan Map 4.3 and Table A2.1). However, it is recognised that Shepherd Market is a small mixed use area with a unique character and as such, the policy is acceptable. As the policy relates only to Shepherd Market, a map clearly showing the extent of the area should be included in the Plan to enable developers, residents, businesses etc to assess whether or not a particular building or buildings fall within the policy area.

### **Protecting Public houses**

The protection of public houses is strongly supported by the Mayor. There has recently been a change to the General Permitted Development Order (GPDO) which has removed permitted development rights from pubs. This means that there is no longer a need to make Article 4 Directions to remove permitted development rights to change the use of pubs to other use classes. The Plan's supporting text should be amended to reflect this change.

If you would like to discuss any of my representations in more detail, please contact [REDACTED] [REDACTED] (020 7983 [REDACTED] / [REDACTED]@london.gov.uk) who will be happy to discuss and arrange a meeting

Yours sincerely,

[REDACTED]

[REDACTED]

**Assistant Director – Planning**

cc Tony Devenish, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Alex Williams, TfL



**From:** [REDACTED]  
**To:** [REDACTED] [@fitzwest.org](mailto:[REDACTED]@fitzwest.org)  
**Cc:** [REDACTED]  
**Subject:** Re: GLA Officer's Response FitzWest Neighbourhood Plan – Pre-submission (Reg 14) Consultation  
**Date:** 12 August 2019 13:07:00

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Dear [REDACTED]

Thank you for consulting the Mayor of London on the Pre-Submission version of the FitzWest Neighbourhood Plan (FWNP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2018, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the FitzWest Neighbourhood Area includes the London Plan and the Westminster City Plan.

### **The Draft New London Plan**

As you are aware, the Mayor published his Draft London Plan for consultation on 1st December 2017 and the Draft London Plan consolidated suggested changes (following examination hearings) on 16 July 2019. Publication of the final version is anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Westminster and the neighbourhood forum's Development Plan and contain the most up-to-date policies. Given the timing, it is likely that the neighbourhood plan will need to be in general conformity with the new London Plan. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Neighbourhood Plan's reference to the published and draft new London Plans.

The FitzWest Neighbourhood Plan is in general conformity with the current and emerging London Plans and the Officer's response below is guidance which should be followed to improve the emerging neighbourhood plan and align it more closely with the draft new London Plan.

### **General**

The extent of the neighbourhood plan area is set out clearly and precisely at the very start and this is welcomed by Officers. Overarching objectives are made clear at the beginning of each chapter of the document, and this clarity is also welcome.

The extent of the neighbourhood plan includes, in its South-eastern corner, part of the Tottenham Court Road Opportunity Area (OA). Indicative targets for the entire OA are for 300 new homes and 6,000 new jobs up to 2041 as set out in Table 2.1 of the draft new London Plan. The part of the OA which lies within the neighbourhood area makes up approximately a third of the entire OA and will be expected to deliver a proportion of the overall indicative targets and these should be recognised and reflected in the neighbourhood plan. In addition, the neighbourhood area lies completely within the Central Activities Zone (CAZ) which is the home to internationally and nationally significant employment and retail functions. The neighbourhood plan should reflect the growth principles set out in draft new London Plan Policy SD4 whilst recognising the quality and character of this predominantly residential neighbourhood.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it positively contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. While Officers consider that the Neighbourhood Plan would positively contribute towards achieving some elements of

sustainable development, it should help contribute more positively and proactively towards the implementation of the emerging Westminster City Plan in meeting housing needs. A positive and proactive approach is considered to be one which recognises and reflects the borough's annual housing target and sets out how it will contribute towards achieving it.

New updated national guidance on neighbourhood planning has been published recently and should be taken into account. New paragraphs 100-106 of the National Planning Guidance now set out information on housing requirement figures, making it clear that an indicative housing requirement figure can be requested by a neighbourhood planning body based on local authority's local housing need as a starting point. If Westminster Council is unable to provide a housing requirement figure, or set out an indicative one, the Neighbourhood Forum should instead use the [neighbourhood planning toolkit on housing needs assessment](#) for this purpose. Neighbourhood Plans are encouraged to meet or exceed identified housing requirements.

Officers welcome the Neighbourhood Plan's identification of additional buildings of heritage importance which are not Statutorily Listed nor included in Westminster's list of local heritage assets, affording them a level of greater consideration in the planning process. This builds upon the approach set out in paragraph 7.1.2 of the Draft New London Plan and is welcomed by Officers. There are a number of conservation areas which make up much of the neighbourhood area and these should be identified clearly and early on as they will act as a constraint to development proposals.

## **Housing**

The overarching objective of the current and Draft New London Plan and Westminster's Local Plan is to deliver more homes that Londoners need whilst protecting land uses such as green space/MoL, employment and industrial land. Westminster's housing target as set out in Table 4.1 of the Draft New London Plan is for 1,010 new homes a year. Westminster's draft City Plan 2040 is more ambitious, setting a significantly greater target of 1,495 homes a year for the next ten years and the neighbourhood plan should set out how it will contribute towards achieving this. The FitzWest Neighbourhood Plan should adopt a more proactive and positive approach towards development in the area based on guidance set out in the Mayor's Good Growth policies GG2 and GG4 and Policy D6 of the Draft New London Plan.

While the intention to manage development is appropriately related to the purpose of neighbourhood planning, the neighbourhood plan seeks to limit refurbishment of 'unlisted buildings of merit' which would lead to an increase in floorspace, for example, additional storeys or Mansard roofs. This approach could frustrate the implementation of the presumption in favour of small sites in the areas identified in Policy H2A of the draft new London Plan, and in those circumstances, would not be supported by the Mayor or Westminster's emerging Local Plan. Instead the forum should develop design codes that would allow the presumption to operate within acceptably defined limits, in accordance with draft new London Plan Policy H2A. It is noted that much of the Neighbourhood Area is covered by a number of conservation areas and although these areas are excluded from the presumption in favour of small housing development, paragraph 4.2A.5 of the draft new London Plan (consolidated changes) should be taken into consideration which encourages the exploration of small site opportunities in these areas.

Officers are happy that the FWNP recognises the 50% strategic target for affordable housing as set out in Policy H5 of the draft new London Plan and the neighbourhood forum's positive approach to the necessary delivery of affordable housing products in London. However, the neighbourhood plan also recognises the 35% threshold set out in the Westminster City Plan and

the draft new London Plan. It should be made explicitly clear which approach is being supported and this should be set out within the body of a policy. It should be noted that Westminster have set a 35% target for affordable housing, whereas the draft new London Plan sets this as a threshold (50% for public land and where industrial capacity is lost) with the intention of increasing affordable housing delivery through grant to achieve 50%. Officers especially welcome the intention that all housing should be 'tenure blind'.

The FWNP recognises and notes that the Mayor's position on the provision of on-site affordable housing has been strengthened and that payments in lieu will only be accepted in very exceptional circumstances and this is welcomed.

### **Building heights**

The aim to restrict the scale of development by limiting proposed building heights to those of the prevailing heights in the immediate area could also prevent the effective operation of the presumption in favour of small housing development and should be avoided. Guidance for the design of tall buildings and the correct approach for the optimisation of development are set out in draft new London Plan Policies D8 and D6 respectively and should be followed. In addition, the neighbourhood plan should value the capacity for growth in the area by understanding that the significant investment in Crossrail will make it one of the most connected places in London and this in turn will unlock the development potential in the neighbourhood area to support London's economy.

What constitutes 'tall building' is defined in Westminster's draft City Plan 2040 as buildings greater than 30m in height, which in turn, reflects the definition set out in Policy D8 of the draft new London Plan and should be referenced and/or reinforced in the neighbourhood plan.

### **Site allocations**

Neighbourhood plans can proactively allocate sites for new development for housing, employment and other uses and they can also protect and safeguard land for future uses such as open space. The Mayor would welcome the allocation of sites in the FWNP where they would positively contribute towards meeting housing, employment and other needs identified in the emerging Westminster City Plan 2040.

### **Community infrastructure priorities**

Officers welcome the neighbourhood plans recognition that CIL receipts collected from development within the neighbourhood area will be given to the forum for the purposes of delivering the neighbourhood plan. The neighbourhood plan in Appendix 4, sets out in the broadest of terms, its infrastructure priorities. However, it is considered that these priorities could be more detailed and area specific and should be agreed in collaboration with Westminster Council and infrastructure providers such as TfL where necessary.

### **Other matters**

Officers welcome the neighbourhood plan's identification of public realm improvements, as set out in Figure 7 and the promotion of air quality improvements set out in Policy EN1 which underpins one of the Mayor's priorities and accords with Policy SI1 of the draft new London Plan.

I hope you have found these comments helpful to inform the next version of the FitzWest Neighbourhood Plan. If you would like to discuss any comments in this letter please contact me, [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk).

Would you please confirm receipt of this response ? Thank you.

Regards

■■■■ ■■■■

Senior Strategic Planner

London Plan Team

Development Enterprise and Environment

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**From:** [REDACTED]  
**To:** [REDACTED] [@fitzwest.org](mailto:@fitzwest.org); [neighbourhoodplanning@westminster.gov.uk](mailto:neighbourhoodplanning@westminster.gov.uk)  
**Cc:** [REDACTED]  
**Subject:** Re: GLA Officer's Response FitzWest Neighbourhood Plan – Submission (Reg 16) Consultation  
**Date:** 03 August 2020 10:58:00

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Dear [REDACTED]

**Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended);**  
**Greater London Authority Acts 1999 and 2007;**  
**Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Fitzrovia West Neighbourhood Plan – Submission Consultation (Regulation 16)**

Thank you for consulting the Mayor of London on the Submission version of the Fitzrovia West Neighbourhood Plan (FWNP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2019, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Fitzrovia West Neighbourhood Area includes the London Plan, the Westminster City Plan and the emerging draft Westminster City Plan 2019-2040.

**The Intend to Publish London Plan**

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish (ItP) version of the London Plan was published on the 17 December 2019. Publication of the final version of the new London Plan is anticipated later in the year, at which point it will form part of Westminster's Development Plan and contain the most up-to-date policies.

Given the timing, the neighbourhood plan must be in general conformity with the new London Plan. In addition, the ItP version of the London Plan and its evidence base are now material considerations and officers welcome the FWNP's reference to both the published and ItP London Plans.

As currently drafted the FWNP is in general conformity with the current and emerging London Plans and the Officer's response below provides support and offers guidance that should be followed to improve the emerging neighbourhood plan and align it more closely with the ItP London Plan.

**General**

The emphasis of the plan on heritage, support for small businesses and culture are all very welcome elements. The extent of the neighbourhood area is illustrated clearly, and the planning context established early on in Figure 2, highlighting the rich heritage that lies within the FWNP boundary and includes the 3 strategic views as set out in the London View Management Framework that run through the area. Overarching objectives are made clear at the beginning of each chapter of the document, and this clarity is also welcome by Officers.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it positively contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. Officers consider that the Neighbourhood Plan would positively contribute towards achieving elements of sustainable development such as through the provision of green infrastructure and the promotion of walking, cycling and public transport.

The FWNP should note that the most up to date version of the new London Plan is the



Intend to Publish (ItP) version <sup>[1]</sup> and that policy numbering and other amendments have been made to that document. For example, Policy D9 of the ItP London Plan now considers tall buildings and not the original Policy D8. References to the London Plan should be checked against the ItP London Plan as it is the most advanced draft of the new London Plan.

The extent of the neighbourhood plan includes, in its South-eastern corner, part of the Tottenham Court Road Opportunity Area (OA). Indicative targets for the entire OA are for 300 new homes and 6,000 new jobs up to 2041 as set out in Table 2.1 of the ItP London Plan. The FWNP may wish to set out how it can positively contribute towards growth in the OA in line with ItP London Plan Policy SD1 part B.

## **Housing**

The FWNP's aspiration to increase the proportion of on-site affordable housing in draft Policy PR2 and at paragraph 5.20 is noted and welcomed by officers and reflects the approach set out in ItP London Plan Policy H4 and paragraph 2.5.8 which advocates the provision of affordable housing on-site in locations within the Central Activities Zone, where the Fitzrovia West neighbourhood area is situated.

Officers welcome at paragraph 5.14 the FWNP's intention to protect existing residential uses in order to support the provision of new social and affordable housing. Policy PR2c is particularly welcome which promotes 'tenure blind' development and reflects ItP London Plan Policy D5 regarding inclusive design and paragraph 3.6.6 which sets out that housing developments should be designed to maximise tenure integration and affordable housing units should have the same external appearance as private housing.

Officers support the FWNP's intention in Policy PR2b to limit the amount of single aspect dwellings as a result of development proposals. This is consistent with ItP London Plan Policy D6C and it should be noted that it is the London Plan's intention to limit single aspect dwellings only where proposals meet design solutions aligned with the requirements set out in Policy D3B of the ItP London Plan.

## **Tall buildings**

Guidance for the design of tall buildings and the correct approach for the optimisation of development are set out in ItP London Plan Policy D9 and should be followed in the FWNP. In addition, the neighbourhood plan should value the capacity for growth in the area by understanding that the significant investment in Crossrail will make it one of the most connected places in London and this in turn will unlock the development potential in the neighbourhood area to support London's economy.

What constitutes a 'tall building' is defined in Westminster's draft City Plan 2040 as buildings greater than 30m in height, which in turn, reflects the definition set out in Policy D9 of the draft new London Plan and could be referenced in the neighbourhood plan. Those locations considered most suitable within the neighbourhood area for tall buildings should be identified on maps setting out appropriate building heights based on local evidence and in accordance with ItP London Plan Policy. It should be made explicitly clear that tall buildings should not affect the strategic views identified in Figure 2 of the FWNP.

## **Culture and the Central Activities Zone**

While the aspirations of the FWNP to include the provision of on-site affordable housing is welcome it should recognise and understand the nature of the CAZ and the London Plan Policy SD4 which supports this strategic designation that is to serve its many predominant functions. Officers consider that overall the FWNP balances both priorities well. The FWNP recognises the significance of its location in the CAZ including its importance as national and international office location, its extremely rich and important heritage and the unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions.

Draft Policy PR3 would benefit from the inclusion of a reference to the Mayor's Agent of

Change principle which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. This is set out in ItP London Plan Policy D13 and should be referenced in draft Policy PR3.

### **Economy**

Draft Policy B1 which seeks to protect and promote small business units is reflective of the approach set out in the ItP London Plan Policy E2 and this is welcome. The draft FWNP policy sets a threshold of 1,000 sqm above which office developments should provide appropriately sized units for small and medium sized enterprises. This approach is applauded but it is not clear how this threshold has been established. In the absence of local evidence to support this threshold, Draft Policy B1 should be amended to include the threshold set out in Policy B2D of the ItP London Plan which is set at 2,500sqm (gross external area).

### **Green infrastructure and air quality**

Officers welcome draft Policy GS1 which seeks to protect and enhance green and open spaces and draft Policy GS2 which seeks to create new green spaces including living roofs and walls both of which are welcome and are reflective of ItP London Plan Policy G4.

It is one of the Mayor's priorities that air quality in London is improved so that it is the best of any major world city as set out in paragraph 9.1.2 of the ItP London Plan and Policy SI1 which addresses improving the capital's air quality. Officers are pleased that the forum is also committed to improving air quality and reducing carbon emissions through the use of renewables and the promotion of active travel through walking, cycling and public transport. Policy SI2 of the ItP London Plan promotes the energy hierarchy and aims to reduce greenhouse gas emissions and the FWNP could make reference to it as part of any future amendments.

### **Transport**

Officers welcome that draft Policy PR2 part g sets a clear requirement that off street parking should not be provided apart from disabled persons car parking. However, it would be helpful to go further and state that occupants of new housing would have no right to apply for a residents parking permit which would be consistent with transport and parking policies in the ItP London Plan.

I hope you have found these comments helpful to inform the next version of the FitzWest Neighbourhood Plan. If you would like to discuss any comments in this letter please contact me, [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk).

Regards

[REDACTED]  
[REDACTED]  
Senior Strategic Planner  
London Plan Team  
Development Enterprise and Environment

Greater London Authority | City Hall, The Queen's Walk, London SE1 2AA

E: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

T: 020 7084 [REDACTED] / M: [REDACTED]

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[1] [https://www.london.gov.uk/sites/default/files/intend\\_to\\_publish\\_-\\_tracked.pdf](https://www.london.gov.uk/sites/default/files/intend_to_publish_-_tracked.pdf)

**From:** [REDACTED]  
**To:** [REDACTED] [\[REDACTED\]@planforsoho.org](mailto:[REDACTED]@planforsoho.org); [REDACTED] [\[REDACTED\]@planforsoho.org](mailto:[REDACTED]@planforsoho.org); [neighbourhoodplanning@westminster.gov.uk](mailto:neighbourhoodplanning@westminster.gov.uk)  
**Cc:** [REDACTED]  
**Subject:** RE: GLA Officer's Response Soho Neighbourhood Plan – Submission Consultation (Regulation 16)  
**Date:** 26 June 2020 11:11:00

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Dear [REDACTED],

Thank you for consulting the Mayor of London on the Submission version of the Soho Neighbourhood Plan (SNP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2018, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Soho Neighbourhood Area includes the London Plan and the Westminster City Plan and the new emerging draft Westminster City Plan 2019-2040.

### **The Intend to Publish (ItP) London Plan**

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. Publication of the final version of the new London Plan is anticipated later in the year, at which point it will form part of Westminster's Development Plan and contain the most up-to-date policies.

Given the timing, the neighbourhood plan must be in general conformity with the new London Plan. In addition, the Intend to Publish (ItP) version of the London Plan and its evidence base are now material considerations and officers welcome the SNP's reference to both the published and ItP London Plans.

The Soho Neighbourhood Plan is in general conformity with the current and emerging London Plans and the Officer's response below provides support and offers guidance that should be followed to improve the emerging neighbourhood plan and align it more closely with the ItP London Plan.

### **General**

The extent of the neighbourhood plan area is set out clearly and precisely early on and this is welcomed by Officers. A summary of policies is included at the beginning and its focus on the positive approach to the area's heritage, economy, culture and the local environment is noted. The strategy is one which simultaneously embraces growth while balancing this against the desire to protect and enhance culture and heritage in the local area.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their neighbourhood to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it positively contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development.

Officers have noted and are pleased that the advice offered in the earlier Regulation 14 response has largely been followed. The current draft of the SNP now highlights the area's relationship with the proposed Soho Special Policy Area, the Tottenham Court Road Opportunity Area and the Soho Conservation Area.

Eight objectives, clearly set out in Chapter Six underpin the neighbourhood plan and are the result of extensive consultation with the local community. This close engagement and the involvement of local people in the development of the Neighbourhood Plan is noted and applauded by officers.

Officers also consider that the SNP balances well the intention to preserve and enhance the character of Soho, including its heritage, culture and attractiveness to businesses with the aspiration to take on appropriate types of sustainable growth in a measured and considered

way. The chosen strategy is one which takes account of up to date evidence including the emerging Westminster City Plan 2019-2040, West End Good Growth Report 2018 and the Soho Heritage and Character Assessment 2018 and is therefore based on local and up-to-date evidence.

### **Heritage**

Draft Policy 1 of the SNP supports and promotes development which responds to the neighbourhood by protecting and enhancing the characteristics of the Soho Conservation Area. The SNP demonstrates a clear understanding of the historic environment and the heritage value of the area and this is consistent with Intend to Publish London Plan Policy HC1. The vision is clearly established in Chapter 5 and seeks to embed the role of local heritage in place making.

### **Tall Buildings**

The SNP's approach to tall buildings has been amended since the Regulation 14 consultation and is now more clearly aligned with the emerging Westminster City Plan and its definition of what constitutes a tall building. The SNP's approach is one which balances the need to protect and enhance the area's heritage with the borough's growth ambitions. Policy 2 identifies those areas most sensitive to tall buildings and makes reference to three London Strategic Views which run through the area and are clearly set out in Figure 3. The approach now reflects the one set out in ItP London Plan Policy D9 and is welcomed by officers. The London Strategic Views illustrated in Figure 3 of the neighbourhood plan are panoramas illustrated in the London View Management Framework and are specifically those views from locations 2A.1, 2B.1 and 4A.1 and could be referenced in the Neighbourhood Plan for clarity. In this respect the SNP is consistent with ItP London Plan Policy HC3.

### **Culture**

Draft Policy 12 seeks the protection and promotion of live music venues where this is considered appropriate. The proposed approach is one which reflects Policy HC6 of the ItP London Plan and supports London's night-time economy and the Mayor's vision for London as a 24-Hour City.

The draft SNP recognises the LGBT+ community and how this has over time become part of the area's identity and this acknowledgement is welcome. In accordance with paragraph 7.6.11 of the ItP London Plan the SNP should recognise how the cultural offer in Soho serves and plays such an important role for the LGBT+ community and should seek to protect and enhance related facilities, especially those used in the evening and night time and illustrated in the [Mayor's Cultural Infrastructure Map](#). In addition, the SNP is encouraged to promote the [Mayor's LGBTQ+ Venues Charter](#) in order to support these types of venue.

### **Parking**

The requirement, in draft Policy 16, that residential development should be car free except for disabled persons car parking and that occupants of new housing have no right to apply for a residents parking permit is strongly supported and consistent with transport and parking policies in the London Plan

### **Other matters**

Reference to the agent of change principle in draft Policies 4 and 13 is welcomed and is consistent with ItP London Plan Policy D13, clearly establishing the responsibility of managing and mitigating noise impacts and other potential nuisances.

The SNP's intention to provide suitable space from commercial development for small and medium sized businesses as set out in Policies 6, 7 and 10 is welcome and is in line with ItP London Plan paragraph 6.1.5 and Policy E2 which promotes these commercial spaces at appropriate rents in order to meet the needs of micro, small and medium sized enterprises and which are also suitable for business start-ups.

The support for the provision of public toilets in draft Policy 14 is welcomed and should be amended to incorporate reference to Policy S6 of the ItP London Plan. This policy seeks the

provision of public toilets from large scale developments (Category 1B, of Part 1 of the Town and Country (Mayor of London) Order 2008 or a locally defined development threshold).

The draft Neighbourhood Plan in Policy 20 intends to improve air quality through better design, the introduction of green infrastructure and through the incorporation of on-site renewables, which is welcome and consistent with Policy SI1 of the emerging London Plan.

Significant thought has gone into how the SNP can promote sustainability through the reduction of energy use, emissions and the retrofitting of existing buildings. These aspirations are welcomed and supported by officers and are consistent with the ItP London Plan Policy SI2 which promotes the energy hierarchy so that new development is lean, clean, green and seen. The SNP should include reference to the energy hierarchy and Policy SI2.

The promotion of green infrastructure in draft Policies 25 and 26 is very welcome and reflects the purpose of Policy G1 of the ItP London Plan.

Officers are strongly supportive of the SNP's intention, in draft Policy 23, that the Brewer and Poland Street Public car parks be earmarked for redevelopment as micro-consolidation centres. Officers note that the earlier intention to safeguard the sites as car parks for a minimum period of five years has now been removed and this is welcome. Micro-consolidation centres would support the functioning of the CAZ by providing capacity for industry and logistics for last mile distribution to support businesses and activities within the local area in accordance with draft new London Plan Policy SD4M.

## Glossary

Affordable housing – the definition in the Mayor's Affordable Housing and Viability Supplementary Planning Guidance should be used. Officers note that the current description in the glossary has now been amended to include intermediate housing and this is welcome. Reference to the Mayor's preferred genuinely affordable housing tenures set out in paragraphs 4.6.3-4.6.9 of the ItP London Plan is encouraged.

Central Activities Zone – Officers are happy that the glossary now refers to ItP London Plan Policy SD4 which defines the CAZ and its functions.

I hope you have found these comments helpful to inform the preparation of the Soho Neighbourhood Plan. If you would like to discuss any comments in this letter please contact me, [REDACTED] on 020 7983 4000 or at [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk).

Can you please confirm receipt of this email?

Thank you.

Regards

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