Response to the public consultation from **London Sustainability Exchange**

THE NEW LONDON PLAN

February 2018

Introduction

London Sustainability Exchange welcomes the opportunity to contribute to the ongoing development of the London Plan and to participate in the continued flourishing of London as a truly sustainable city.

Here we set out our response, which draws on the findings of Future London seminars held at the Crystal during the summer autumn and winter of 2016/17 and our main events concentrating on the development of the London Environment Strategy in the London Plan held in the summer autumn and winter of 2017/18 held at City Hall, London Zoo and the Crystal.

Scope of our response

We are excited about the direction of travel that is set out in the document. Our communities' feel that the analysis of the challenges facing London is about right, in particular we support the concept of Good Growth; supporting a better city for all Londoners. We are however concerned, given the extent of the challenges and the vision of the document, that some detailed attention to how this vision is going to be delivered could be clearer. Developers need to know how to deliver the plan, and planners will need to be able to establish what good looks like.

Our response to this consultation is informed by LSx's direct experience of delivering our behaviour change programme of work, aimed at improving air quality and public health across London. Our programme a number of projects in particular supporting those vulnerable to the impact of pollution and fuel poverty; we have held a series of events that has enabled communities to develop comments on :

- Cleaner Air 4 Communities
- Cleaner Air 4 Schools
- Breath London
- Energise London
- Pollinator Paths
- Other projects tackling wider issues such as health and well-being

We will comment on the approach the document has made, marking our proposed 'tracked changes in red underlined' where appropriate in the following places:

- Chapter1 - Policy GG6a,GG6b,GG6d
- Chapter 3 - Policy D1 ,D2e,D2g1,D4a,D410h,D7,d8b,
- Chapter 8 - G1,G5b,G5c,G6c4,G6d,G7b2,
- Chapter 6 - Policy E74f
- Chapter9 - PolicySI1a, SI1.2,SI1.3,SI1.4, SI1.4, SI1.6,SI1.8,SI1.9,SI1.10
- Chapter 9 - Policy SI2c, SI2d, SI2e, SI2f,
- Chapter9 - Policy SI3b10,
- Chapter9 - Policy SI4,
- Chapter9 - Policy SI5b,Policy SI5 c3,SI5 c4,SI5.c5,SI5.c6
- Chapter9 - Policy SI6. a1,SI6.a.2,SI6.a.3,SI6.a.4
- Chapter9 - Policy SI8.a.5, SI8.b.4
- Chapter9 - Policy SI7.a.5,SI7.a.6
- Chapter 10 - T1,T2,T4,T6, T7

About London Sustainability Exchange

London Sustainability Exchange (LSx) is a think and do charity that aims to accelerate the transition to a sustainable London by connecting and motivating people.

As a charity we work in partnership with business, government and the voluntary sector to:

- Reduce London's environmental footprint
- Improve the lives of London's disadvantaged communities
- Improve the health of Londoners
- Improve the knowledge and skills of our communities to achieve these goals

To achieve these goals we run learning networks and innovative exemplar schemes. We also seek to influence policy and practice throughout London.

We were founded in 2001 by the City of London and a group of influential partners, who continue to shape our development. In April 2008 we became an independent charity, having initially operated as a programme of Forum for the Future.

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- Chapter 1 Planning London's Future (Good Growth)

The Mayor should undertake an interim review and further alternations of the London Plan "Post-Brexit" to take account of future scenarios and economic impact and population growth.

Policy GG6 Increasing efficiency and resilience

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

A. Seek to improve energy efficiency reduce heat risk and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050.
B. ensure buildings and infrastructure are designed in line with the revised SPG on Sustainable Design and Construction) which will include guidance on ~~to~~ adaptation to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect. Also should include procedures for post construction evaluation. Failure to comply with agreed standards in the post construction evaluation will result in fees being paid in line with the offsetting procedure.
C. Create a safe and secure environment which is resilient against the impact of emergencies including fire and terrorism.
D. Take an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together and create initiatives that encourage behaviour change and promote sustainable lifestyles.

LSx comments on GG6

A. Zero carbon city is a misleading term as it's not referring to producing zero CO2 emissions but to reduce them by 35% (target extended to be met by 2016) and actually zero carbon 2019-2050 (Sustainable Design and Construction SPG).
    - These targets have been also extended from the ones originally proposed. Initially 35% was to be achieved by 2016 (for non-residential buildings), currently is 2019. Also the zero carbon targets were initially year 2031 and have now been set for year 2050.
    - What can be done to prevent further extensions to these targets unless they are to actually improve emission standards?
    - What organisations are involved in defining these targets? What process and parameters are being followed to define them to establish that they are achievable but at the same time stringent enough?

D. There are not behavioural/educational programmes being implemented or agreed by the energy sector to address an integrated approach that involves the public and communities.

- Chapter 3 Design

Policy D1 London's form and characteristics

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

A. The form and layout of a place should:

9. help prevent or mitigate the impacts of noise and poor air quality

LSx comments on D1

- Should refer to NICE guidance (published June 2017) and IAQ, 'Land-Use Planning & Development Control: Planning For Air Quality' (published January 2017)
- Evidence: http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#planning
- Comment: Since there will be an SPG on sustainable design and construction, it is important that this includes how to prevent mitigate or adapt the impacts of poor air quality

Policy D2 Delivering Good Design

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

5. air quality and noise levels

E. Design and access statements submitted with development proposals should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan including SPG such as the SPG on Sustainable Design and Construction, which will include provision for the evaluation and monitoring of indoor air quality.

F. Boroughs and applicants should use design review to assess and inform design options early in the planning process. Design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation, before a planning application is made, if they:

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

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

1. design reviews are carried out transparently by independent experts in relevant disciplines including sustainability experts
2. design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme

3. where a scheme is reviewed more than once, subsequent design reviews reference and build on recommendations of previous design reviews
4. design review recommendations are appropriately recorded and communicated to officers and decision makers
5. schemes show how they have considered and addressed the design review recommendations planning decisions demonstrate how design review been addressed.

LSx comments on D2

- The SPG for Sustainable Design and Construction should be referred to in the policy statement This will not only alert developers and designers to the expectation that sustainability must be built into all designs, but it will ensure that the SPG has status and is material in planning considerations. Design panels can often include the sustainability element – the design panel in the Lee Valley for the 2012 games included a sustainability panel, which proved to be extremely effective.

D4 Housing Quality and Standards

A. To optimise the development of housing and support sustainable behaviours on sites across London a range of housing typologies will need to be built. To bring forward development on constrained sites, innovative housing designs that meet the requirements of this policy, including minimum space standards, are supported. In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures.
B. New homes should have adequately-sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes. Particular account should be taken of the needs of children, disabled and older people.
C. Qualitative aspects of a development are key to ensuring successful sustainable housing and should be fully considered in the design of any housing developments.
D. Housing developments are required to meet the minimum standards below. These standards apply to all tenures and all residential accommodation that is self-contained.

Private internal space

1. Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.
2. A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.
3. A one bedspace single bedroom must have a floor area of at least 7.5 sqm and be at least 2.15m wide.
4. A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sqm.
5. Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sqm within the Gross Internal Area).
6. Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.
7. A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the

minimum widths set out above. Any built-in area in excess of 0.72 sqm in a double bedroom and 0.36 sqm in a single bedroom counts towards the built-in storage requirement.

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

Private outside space

9. A minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1.
10. The minimum depth and width for all balconies and other private external spaces should be 1.5m.

E. Residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 London's form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

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

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

H. Dwellings should be designed with adequate and accessible drying space to ensure that laundry can be dried comfortably without causing condensation within the home, and without the requirement for energy intensive drying mechanisms.

The Mayor will produce guidance on the implementation of this policy including an SPG on Sustainable Design and Construction, for all housing tenures.

LSx comments on D2

- Additional space will be required for drying as well as storage of recyclable materials. Condensation within the home caused by drying laundry is one of the major contributions to poor air quality within the home.

Policy D7 Public Realm

Development Plans and development proposals should:

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

LSx comments on D7

The London Plan needs to produce guidance on the implementation of this policy and include this in the SPG on sustainable design and construction.

Policy D8 Tall Buildings

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

Environmental Impact

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

LSx comments on D8

The London Plan needs to produce guidance on the implementation of this policy i.e. how to design out noise and pollution and include the information in the SPG for sustainable design and construction. This needs to be referred to in the policy

- Chapter 8 Green Infrastructure and Natural Environment

Overview of comments: Clarification of implementation strategies and "how to" are needed to ensure that there is an actual net gain in biodiversity, green area, and canopy cover to ensure aims are met. Enforcement of measurable targets is necessary.

G1 Green Infrastructure Greening

A. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.
B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
C. Development Plans and Opportunity Area Planning Frameworks should:
1) identify key green infrastructure assets, their function and their potential function
2) Identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

LSx comments on G1

There is more scope for specifying in the policy how Green Infrastructure can be linked to air quality management. This needs to be included in the SPG for sustainable design and construction and referred to in this policy.

We welcome this statement – and agree that all development takes place within a wider environment and green infrastructure, and should be seen as an integral element and not as an 'add on'. Policy G1 needs to be strengthened to ensure that this will be the case.

G5 Urban Greening

A. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
B. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of ~~0.4~~ 0.5 for developments that are predominately residential, and a target score of ~~0.3~~ 0.4 for predominately commercial development.
C. Developers should follow standards that ensure an environment suitable for wildlife such as pollinator species.

LSx comments on G5

- Policy G5 (B) Urban Greening Factor (Table 8.32) should also take account of "heat risk reduction" achieved through such measures in the scoring factor.
- Guidance to implement this policy should be included in the SPG for sustainable design and construction
- If we are to take a systems thinking approach in green infrastructure; the policy should be amended to include air quality should be a feature in the urban greening factor.
- The responsibility seems to rest only with the borough. Local Authorities are hard pressed and therefore unlikely to address this, the London Plan and the Mayor will therefore need to be explicit about support to the boroughs.

G6 Biodiversity and access to nature

A. Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.
B. In developing Development Plan policies, boroughs should:
    1. use the relevant procedures to identify SINCs and green corridors. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board
    2. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
    3. seek opportunities to create habitats that are of particular relevance and benefit in an urban context
    4. include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations
    5. ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed.
C. Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts,:
    1. avoid adverse impact to the special biodiversity interest of the site
    2. minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site
    3. seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.
    4. pesticide & herbicide use as well as soil conservation must be taken into account to ensure no adverse effects on biodiversity
D. Biodiversity enhancement should be considered from the start of the development process, and the Mayor will set out guidance on how this can be achieved.
E. Proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.

LSx comments on G6

C. What would make a development that harms a SINC "acceptable" or "unavoidable"? Clearer definition of what *minimising the developmental impacts* would look like - This policy also gives developers the option to "seek appropriate off-site compensation in exceptional cases where the development proposal clearly outweigh the biodiversity impacts". The approach to any biodiversity offsetting needs to be fully established to protect and enhance London's biodiversity, and a strict regulation and enforcement is necessary to make sure organisations uphold to the standards.

G7Trees & Woodland

A. Trees and woodlands should be protected, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
B. In their Development Plans, boroughs should:
    1. protect 'veteran' trees and ancient woodland where these are not already part of a protected site
    2. identify opportunities for tree planting in strategic locations – specific targets to be identified.
C. Development proposals should ensure that, wherever possible, existing trees of quality are retained[108]. If it is imperative that trees have to be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

[108] Category A and B trees as defined by BS 5837:2012

LSx comments on G6

- B. 2. "Identifying opportunities" for tree planting by boroughs is not enough- specific targets and measurable aims using iTree/CAVAT that ensure at least a 10% increase in canopy cover by 2050 and a wider variety of species should be included in the LP.
- Trees help trap air pollutants as well as providing us with much needed oxygen. The Forestry Commission, have produced planning guidance. This should be referred to in the policy. Evidence: https://www.forestry.gov.uk/pdf/fcib001.pdf/$file/fcib001.pdf

- Chapter 6 Economy

Policy E4 land for industry, logistics and services to support London's economic function

A. A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained. This is set out in the infrastructure mapping application. This should make provision for:

1 light and general industrial uses
2 storage and logistics/distribution including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
3 secondary materials and waste management
4 utilities infrastructure, such as switching stations, energy storage and gas e.g. hydrogen pipelines, water management and sewage treatment sites
5 land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
6 wholesale markets
7 emerging industrial-related sectors
8 flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population
9 low-cost industrial and related space for micro, small and mediumsized enterprises (see also Policy E2 Low-cost business space) taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see Policy E7 Intensification, co-location and substitution of land for industry, logistics

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

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

1. the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing
2. the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
3. the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied
4. appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:
    a. safety and security (see Policy D10 Safety, security and resilience to emergency and Policy D11 Fire safety)
    b. the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see Policy T4 Assessing and

mitigating transport impacts)

c. design quality, public realm, visual impact and amenity for residents (see Policy D1 London's form and characteristics, Policy D2 Delivering good design, Policy D3 Inclusive design, Policy D4 Housing quality and standards, Policy D5 Accessible housing, Policy D6 Optimising housing density, Policy D7 Public realm and Policy D8 Tall buildings)
d. vibration and noise (see Policy D13 Noise)
e. air quality, including dust, odour and emissions (see Policy SI1 Improving air quality and Policy SI2 Minimising greenhouse gas emissions).
f. Water management and sewage treatment sites

LSx comments on E4 and E7

- Our communities strongly support the safeguarding of land for the purposes of infrastructure including logistics centres and infrastructure for water and sewage management; in fact there was a strong appetite more land and corridors to be safeguarded for these purposes, and set out similarly to the same process that has applied to the transport corridors. These should be set out clearly in the Infrastructure Mapping Application; this application should be referred to in the face of the London Plan.
- Water and sewage management should be included in the SIL provisions.

- Chapter 9 Sustainable Infrastructure

SI1 Improving Air Quality

A. Air quality is a material consideration and one of the reasons why planning could be refused.[1] London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:
    1. Development proposals should not:
        a. lead to further deterioration of existing poor air quality
        b. create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
        c. reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality
        d. create unacceptable risk of high levels of exposure to poor air quality.
    2. The Mayor should provide more detail should be given in order to demonstrate the type of design that will ensure air quality will be improved as a result of the development[2] Specific guidance on design will be included in the spg on sustainable design and construction, details will include :
        - siting living accommodation away from roadside
        - avoiding the creation of street and building configurations (such as deep street canyons) that encourage pollution to build up where people spend time
    3. Development proposals should use design solutions to eliminate the possibility and prevent ~~or minimise~~ increased exposure to existing air pollution and make

provision to address local problems of air quality. Whilst all new develops must be designed with minimising pollutions in mind, particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people. The Mayor should provide guidance in the form of supplementary planning guidance (SPG) on sustainable design and construction. The guidance should be referred to in the policy[3]. In AQFA all developments should be air quality positive.

4. The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment (conducted in accordance with the agreed guidelines) should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral.
5. Development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance [115].
6. Air Quality Assessments (AQAs) should be conducted in accordance with the guidance submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use.
7. Development proposals should ensure that where emissions need to be reduced, this is done on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated.
8. 'Post occupancy evaluation (POE) should be a undertaken to ensure performance is met as planned.
9. The Community Infrastructure Levy (CIL) should be used for infrastructure to reduce or mitigate to the impacts of air pollution.
10. We would recommend the use of Community Infrastructure Levy (CIL) to use for infrastructure to reduce or mitigate to the impacts of air pollution[4].

[1] Evidence: http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf

[2] Evidence https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#planning

[3] Evidence: http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf

[4] Evidence: http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf4

[115] Guidance is currently in 'The control of dust and emissions for construction and demolition SPG'

LSx comments on SI 1

- From talking to stakeholders, it is clear that more detail should be given in order to demonstrate the type of design that will ensure air quality will be improved as a result of the development: https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#planning
- Guidance should be given in the form of supplementary planning guidance (SPG) on

sustainable design and construction. The guidance should be referred to specifically in this policy. Evidence: http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf

- SI1.2 should eliminate the possibility of increasing exposure to air pollution. Development proposals should use design to prevent increased exposure to air pollution and make provision to address local problems related to air quality.
- SI1 2) states: "*Development proposals should use design solutions to prevent ~~or minimise~~ increased exposure to existing air pollution and make provision to address local problems of air quality*". It should eliminate the possibility of increasing exposure to air pollution. While all development proposals should be designed with reducing the impact of air pollution in mind; particular case should be referred to in the policy. Air Quality Neutral: Benchmarks are currently set based on the average building stock in a given use class in London.

https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf

http://www.aqconsultants.co.uk/getattachment/Resources/Download-Reports/GLA-AQ-Neutral-Policy-Final-Report-April-2014.pdf.aspx

- Air Quality Positive (AQP): There is no reference to the parameters that define AQP and what developers should aim to achieve in this regard. This should be included in the SPG on Sustainable Design and Construction
- As many buildings do not perform as planned, a 'Post occupancy evaluation (POE) should be a requirement.
- Non-Air Quality Focus Areas: Benchmarks and restriction for air pollution in areas that are not AQFA are based on Air Quality Neutral and Air Quality Positive which are not stringent enough or haven't been referenced.
- Air Quality Neutral: Benchmarks are currently set based on the average building stock in a given use class in London. Is this stringent enough?
  https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf
  http://www.aqconsultants.co.uk/getattachment/Resources/Download-Reports/GLA-AQ-Neutral-Policy-Final-Report-April-2014.pdf.aspx
- Developers will need specific guidance on how to reduce the impact of pollution.

9.1.8 **Air Quality Focus Areas** (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO2) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. There are currently 187 AQFAs across London (Figure 9.1). The list of Air Quality Focus Areas is updated from time to time as the London Atmospheric Inventory is reviewed and the latest list in the London Datastore should always be checked.

- **Comment:** NICE guidance indicated that work addressed in hotspots alone could cause knock-on effects or difficulties. This should be addressed by the policy. It should also be clear that with additional monitoring more hotspots will be introduced to the AQFAs.
- **Evidence:** https://www.nice.org.uk/guidance/ng70/chapter/Recommendations

Policy SI 2 Minimising greenhouse gas emissions

A. Major development should be net zero-carbon. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
    1. Be lean: use less energy and manage demand during construction and operation.
    2. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI3 Energy infrastructure.
    3. Be green: generate, store and use renewable energy on-site.
B. Major development should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and will be expected to monitor and report on energy performance.
C. In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations [117] is expected. Residential development should ~~aim to~~ achieve 10 per cent as a minimum and aim to achieve 20 percent, and non-residential development ~~should aim to~~ achieve 15 per cent as a minimum and aim to achieve 25 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided:
    1. through a cash in lieu contribution to the relevant borough's carbon offset fund, and/or
    2. off-site provided that an alternative proposal is identified and delivery is certain.
D. Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver direct greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.
E. Reduce Performance Gap - all new developments will include provision for post occupancy evaluation. Developments not complying with agreed energy saving targets will be required to comply with offsetting procedures.
F. The Mayor ~~may~~ will publish further planning guidance on sustainable design and construction [122] and will continue to regularly update the guidance on preparing energy strategies for major development. Boroughs are encouraged to request **energy strategies** for other development proposals where appropriate.

[117] Building Regulations 2013. If these are updated, the policy threshold will be reviewed

LSx comments on SI 2

A. While the Energy Hierarchy is a good strategy and zero-net-carbon development was present

in the previous 2011 London Plan (with a target of 2016, Policy 5.2 minimising carbon dioxide emission) and to date has not been achieved. How can we ensure that the same strategy will produce better results going forward?

1. Be Lean: Reduction by design
2. Be Clean: Punitive measures or the introduction of a levy (similar to Stamp Duty) should be used to further encourage developers to use renewables
3. Be Green: **35% reduction is not zero**.

There is considerable body of work outlining the process for post occupancy evaluation. This is an important element in the design cycle and will provide valuable information for all sites moving forward. Recent developments in the Internet of Things (IoT) will assure that monitoring information is accurate. Sites that do not meet agreed energy saving should be considered to be included in the offsetting procedures.

9.2.5 - To meet the zero-carbon target, an on-site reduction of at least 35 per cent beyond the baseline of part L of the current Building Regulations is required[119]. The minimum **improvement over the Target Emission Rate** (TER) will increase over a period of time in order to achieve the zero-carbon London ambition and reflect the costs of more efficient construction methods. This will be reflected in future updates to the London Plan.

- **Comment**: In the current London Plan this threshold was made explicit (see below). This new London Plan does not clearly outline by how much the TER will be raised across time to reach the 2050 zero carbon target.

B The Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019.

Residential buildings:

Year	Improvement on 2010 Building Regulations
2010 – 2013	25 per cent (Code for Sustainable Homes level 4)
2013 – 2016	40 per cent
2016 – 2031	Zero carbon

Non-domestic buildings:

Year	Improvement on 2010 Building Regulations
2010 – 2013	25 per cent
2013 – 2016	40 per cent
2016 – 2019	As per building regulations requirements
2019 – 2031	Zero carbon

9.2.7 - The price for offsetting carbon [120] is regularly reviewed. Changes to the GLA's suggested **carbon offset price** will be updated, in future guidance. New development is expected to get as close as possible to zero-carbon on-site, rather than relying on offset fund payments to make up any shortfall in emissions. However, **offset funds** do have the potential to unlock carbon savings from the existing building stock through energy efficiency programmes

and by installing renewable technologies – typically more expensive to deliver in London due to the building age, type and tenure.

- **Comment:** This does not prevent stop the overuse of offset funds by developers who would rather 'pay' to pollute and sidestep any element of the 'energy hierarchy' to reach the 35% carbon reduction target (this can be found in figure 9.2 – pyramid).

9.2.10 The Mayor ~~may~~ will publish further planning guidance on sustainable design and construction [122] and will continue to regularly update the guidance on preparing energy strategies for major development. Boroughs are encouraged to request **energy strategies** for other development proposals where appropriate.

- [122] - This will build on the 2014 Sustainable Design and construction SPG.

- **Comment:** There should commit to the review and revise the SPG on Sustainable Design & Construction to support the implementation of the new London Plan &London Environmental Strategy.

Policy SI3 Energy Infrastructure

A. Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.
B. Energy masterplans should be developed for ~~large-scale~~ all development locations which establish the most effective energy supply options. Energy masterplans should identify:
    1. major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)
    2. heat loads from existing buildings that can be connected to future phases of a heat network
    3. major heat supply plant
    4. possible opportunities to utilise energy from waste
    5. secondary heat sources
    6. opportunities for low temperature heat networks
    7. possible land for energy centres and/or energy storage
    8. possible heating and cooling network routes
    9. opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
    10. adequate infrastructure and land requirements for electricity and gas supplies
    11. Implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.
C. Development Plans should:
    1. identify the need for, and suitable sites for, any necessary energy infrastructure requirements including upgrades to existing infrastructure
    2. identify existing heating and cooling networks and opportunities for expanding existing networks and establishing new networks.
D. Major development proposals within Heat Network Priority Areas should have a communal heating system
    1. the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:

a. connect to local existing or planned heat networks
b. use available local secondary heat sources (in conjunction with heat pump, if required, and a lower temperature heating system)
c. generate clean heat and/or power from zero-emission sources
d. use fuel cells (if using natural gas in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)
e. use low emission combined heat and power (CHP) (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)
f. use ultra-low NOx gas boilers.

2. CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that there is no significant impact on local air quality.
3. Where a heat network is planned but not yet in existence the development should be designed for connection at a later date.

LSx comments on SI 3

A. Development plans should include potential areas in the map to expand existing networks and establish new networks.

Comment: The provisions in SI3 focuses solely focus Energy Master Plans for large scale developments. This should be expanded to include all developments. The main thrust of this New London Plan is to include provision for small sites, therefore it is important to include small sites in the development of a heat network. Stakeholders should collaborate with the relevant stakeholders to devise local energy plans that foster district heating networks for existing and future smaller scale development schemes. Heat Networks are applicable to site larger than six dwellings.

The commentary in the document should refer to existing masterplans such as the Islington Master Plan (https://www.london.gov.uk/sites/default/files/energy_masterplan_for_london_borough_of_islington.pdf). This will provide guidance to boroughs and developers on what an energy masterplan could look like.

Energy masterplans should include provision for renewables and energy storage in order to assure that the entire grid has power capacity required by new developments. It is essential in the transition that all new developments are connected to gas in order to assure affordability of fuel.

Figure 9.3 Heat Network priority areas: These maps are from an infrastructure mapping application –a live app that all developers should know and use – this should be made clear to developers and the should be referred to it.

9.3.1 The Mayor will work with boroughs, energy companies and major developers to promote the timely and effective development of London's energy system (energy production, distribution, storage, supply and consumption).

- **Comment:** There is no mention of infrastructure investment in technology and data. For example, IoT (Internet of Things) and Smart City Solutions are initiatives being implemented by other cities to optimise energy, transportation and logistics among others.

9.3.2 London is part of a national energy system and currently sources approximately 95 per cent of its energy from outside the GLA boundary. Meeting the Mayor's zero-carbon target by 2050 requires changes to the way we use and supply energy so that power and heat for our buildings and transport is generated from clean, low-carbon and renewable sources. **London will need to shift from its reliance on using natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources**. Decentralised energy will become an increasingly important element of London's energy supply and will help London become more self-sufficient in relation to its energy needs.

- **Comment:** Gas meets 90% of London's heating demand. "Shifting from gas" is unrealistic without an appropriate timeframe or alternative energy provisions available. Moreover, the gas infrastructure upgrade currently taking place will allow for 'gas blends' and hydrogen to be transported. This should be taken account of.

9.3.3 - Developments should connect to existing heat networks, wherever feasible. Stimulating the delivery of new district heating infrastructure enables the opportunities that district heating can deliver to be maximised. The Mayor has identified Heat Network Priority Areas, which can be found on the London Heat Map website [123]. These identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers. Data relating to new and expanded networks will be regularly captured and made publicly available.

[123] https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map

- **Comment:** The useful tool in the link above gives data on policy indicators (such as social density fuel poverty rates etc.) yet the map only focusses on heat network priority areas & how London can satisfy future heat demand based on existing demand. Like in the Water Infrastructure chapter (9.5.7) there needs to be a proposal somewhere that mentions the measures required to alleviate fuel poverty (alongside future developments in infrastructure.) This is supported by our LES consultation.

9.3.11 - Land will be required for energy supply infrastructure including **energy centres**. These centres can capture and store energy as well as generate, supply and distribute it. The ability to efficiently store energy could reduce overall energy consumption, reduce peak demand and make renewable energy more effective.

- **Comment**: This does not specify what land or an existing policy/plan that is ensuring energy storage. Potential future risk on building these on the green belt.

Policy SI4 Managing heat risk

A. Development proposals should minimise internal heat gain and the impacts of the urban heat island through design, layout, orientation and materials.
B. Both major and small development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy, which is set out in the SPG on Sustainable Design & Construction:
    1. minimise internal heat generation through energy efficient design
    2. reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls
    3. manage the heat within the building through exposed internal thermal mass and high ceilings
    4. provide passive ventilation
    5. provide mechanical ventilation
    6. Provide active cooling systems.

LSx additional comments on SI4

A. More details will be required in order that developers can assure appropriate design. As with SI2, targets should be given. All the relevant active, passive and design measures should be clearly signposted as specified by the 2014 SPG for Sustainable Design and Construction (p.37.)
B. Given Policy H2 that "Small Sites" should play a greater role in housing, S14 Managing Heat Risk should not apply exclusively to major developments where this does not conflict with H7 "Affordable Housing"

Offsetting options should be also included in the cooling hierarchy as a 'last resort' similarly to SI 2.

Policy SI5 Water infrastructure

A. In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.
B. Development Plans should promote improvements to water supply infrastructure to ensure security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account. Designs standards set out in the SPG for Sustainable Design and Construction should be met.
C. As a minimum, development proposals should:
    1. minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)
    2. achieve at least the BREEAM excellent standard (commercial development)
    3. ~~be encourage to~~ incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.
    4. Where these are not possible on the site the principles of offsetting procedures will be followed.
    5. Seek to safeguard land for essential water infrastructure and sewage treatment facilities
    6. Build in water neutrality into the integrated infrastructure plan[1]
D. In terms of water quality Development Plans should:
    1. promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans
    2. support strategic wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Such infrastructure should be constructed

in a timely and sustainable manner taking account of new, smart technologies, intensification opportunities on existing sites, and energy implications. Boroughs should work with Thames Water in relation to local wastewater infrastructure requirements.

E. Development proposals should:
    1. seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided be designed to ensure that misconnections between foul and surface water networks are eliminated and not easily created through future building alterations.
    2. be designed to ensure that misconnections between foul and surface water networks are eliminated and not easily created through future building alterations.

[11]

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291675/scho1009bqzr-e-e.pdf

LSx additional comments on SI5

The relevant water saving appliances and retrofits for future proofing for both residential and commercial developments should be signposted. These could include low water fixtures such as dual flush toilets, waterless urinals and tap aerators (2014 SPG Sustainable Design & Construction P.57.)

Water policies should be emphasised and strengthened with specific targets and hierarchy similarly to Energy policies.

London should learn lessons from Mexico City and Cape Town in regards to sewage treatment and water management.

9.5.6 Infrastructure investment is constrained by the short-term nature of water companies' investment plans. Similar to the approach to electricity supply (see also paragraph 9.3.8), in order to facilitate the delivery of development it is important that investment in water supply infrastructure is provided ahead of need. To minimise wastage, water supply infrastructure improvements should give consideration to the replacement of ageing trunk mains.

- Comment: Very much producer, led no promise by network operator to ensure this investment is made

9.5.7: In the context of the significant investment needed, measures to protect and support vulnerable customers in particular from rising water bills are important.

- Comment: The specific measures required to address the both income and non-income causes of water poverty/precocity must be clarified, as well as delineating the (mandate/responsibility) of water operators/providers to ensure that vulnerable customers are actively engaged with critical advice, finance and support.

Policy SI 6 Digital Connectivity

A. To ensure London's global competitiveness now and in the future, development proposals should:
    1. achieve greater digital connectivity than set out in part R1of the Building Regulations, to ensure universal broadband access and public wireless to access
    2. ensure that sufficient ducting space for future digital connectivity infrastructure is provided prioritise investment in high speed (1gb+) broadband infrastructure
    3. meet requirements for mobile connectivity within the development and take appropriate mitigation measures to avoid reducing mobile connectivity in surrounding areas, link together mobile and broadband networks
    4. support the effective use of the public realm (such as street furniture and bins) to accommodate well-designed and located mobile digital infrastructure and IoT technology.

SI8 Waste capacity and net waste self sufficiency

A. In order to manage London's waste sustainably:
    1. the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026
    2. existing waste management sites should be safeguarded (see Policy SI9 Safeguarded waste sites)
    3. the waste management capacity of existing sites should be optimised
    4. new waste management sites should be provided where required
    5. environmental, social and economic benefits from waste and secondary materials management should be created, including opportunities for reuse in line with the waste hierarchy

B. Development Plans should:
    1. identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantums of waste will be managed
    2. allocate sufficient land and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 - boroughs are encouraged to collaborate by pooling their apportionment requirements
    3. identify the following as suitable locations to manage borough waste apportionments:
        a. existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity
        b. Strategic Industrial Locations and Locally Significant Employment Sites / land
        c. safeguarded wharves with an existing or future potential for waste and secondary material management.
    4. Ensure that there is adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food

C. The following are particularly encouraged – development proposals which:
    1. deliver a range of complementary waste management and secondary material processing facilities on a single site
    2. support prolonged product life and production of secondary materials including

repair, refurbishment and remanufacture
3. contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste
4. provide combined heat and power and/or combined cooling heat and power
5. contain proposals to effectively deal with CD&E waste on site and minimise export to landfil

D. Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:
    1. the nature of the activity, its scale and location
    2. job creation and social value benefits including skills, training and apprenticeship opportunities
    3. achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings - facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced
    4. the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) - where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed
    5. the transport and environmental impacts of all vehicle movements related to the proposal - the use of renewable fuels from waste sources and the use of rail and waterway networks to transport waste should be supported.

SI7 Policy SI7 Reducing waste and supporting the circular economy

A. Waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by:
    1. promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible
    2. encouraging waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of products
    3. ensuring that there is zero biodegradable or recyclable waste to landfill by 2026
    4. meeting or exceeding the recycling targets for each of the following waste streams and generating low-carbon energy in London from suitable remaining waste:
        a. municipal waste[127] – 65 per cent by 2030
        b. construction, demolition and excavation waste – 95 per cent by 2020
    5. designing all developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food
    6. providing storage facilities for materials to be re-used or upcycled.
B. Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:
    1. how all materials arising from demolition and remediation works will be re-used and/or recycled
    2. how the proposal's design and construction will enable building materials, components and products to be disassembled and re-used at the end of their useful life
    3. opportunities for managing as much waste as possible on site
    4. adequate and easily accessible storage space to support recycling and re-use
    5. how much waste the proposal is expected to generate, and how and where the waste will be handled.

[127] Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes local authority collected waste and waste collected by the private sector.

- Chapter 10 Transport

T1 Strategic approach to transport
LSx comments on T1 • Our communities are concerned that there is no reference to improving air quality in the London underground. Our communities feel that this is an issue.

T2 Healthy streets
LSx comments on T2 • We strongly support the healthy streets approach. Development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance.

T4 Assessing and mitigating transport impacts
Supporting text: 10.4.3 It is important that development proposals reduce the negative impact of development on the transport network and reduce potentially harmful public health impacts. The biggest transport-related impact of development on public health in London is the extent to which it enables physical activity from walking, cycling and using public transport. The other main impacts on public health relate to air quality, road danger, noise, and severance. The phasing of development, and the use of travel plans and freight strategies, may help reduce negative impacts and bring about positive outcomes. Where adverse transport impacts have been identified from development proposals, mitigation will be sought in the form of financial contributions – to improve network service levels for example – or through directly providing infrastructure such as additional bus stops and street improvements, or pollution mitigation infrastructure.
LSx comments on T4 • How does the policy ensure that this (10.4.3) will actually happen?

T6 Car Parking

B. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').

E. Where car parking is provided in new developments, provision should be made for infrastructure for electric or fuelling for other Ultra-Low Emission vehicles.

Policy T7 Freight and servicing

A. Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight and servicing strategies. These should seek to:
    1. 1) reduce freight trips to, from and within these areas
    2. 2) coordinate the provision of infrastructure and facilities to manage freight and servicing at an area-wide level
    3. 3) seek to reduce emissions from freight, such as through sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

Such strategies should be developed through policy or through the formulation of a masterplan for a planning application.

B. To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported, and alternative fuels such as LPG or CNG in the short term.

C. Wharves and railheads involved in the distribution of aggregates should be safeguarded in line with Policy SI9 Safeguarded waste sites, Policy SI10 Aggregates and Policy SI5 Water infrastructure.

D. Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.

E. Development proposals for new consolidation and distribution facilities should be supported provided that they:
    1. deliver mode shift from road to rail or water without adversely impacting passenger services (existing or planned) and without generating significant increases in street-based movements
    2. reduce traffic volumes within London
    3. reduce emissions from freight and servicing trips
    4. enable sustainable last-mile movements, including by cycle and electric vehicle.

F. Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

G. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

H. At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.

I. Development proposals must adopt appropriate construction site design standards to enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.

LSx comments on T7

We welcome the focus on freight transport in the London Plan, and share the view that freight

is the next challenge in the decarbonisation of transport.
However we would argue that road freight movements inside the Capital cannot be reduced to zero entirely. Although there are some notable gains to be made from more strategic and efficient management of freight movement we would urge the Mayor of London to aim to outline proposals which manage road freight that will still, inevitably, retain some presence in the city.

We strongly support the development of consolidation centres throughout the city.