

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
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Dear Mr Khan

Notting Hill Housing Trust (NHHT) is one of London's leading housing associations.

We were formed more than 50 years ago to meet the capital's unique housing challenges, and we are still providing low cost homes for those who need them most. Our approach is to provide good quality, affordable homes, and we have adapted and diversified our portfolio over time to address significant changes in the housing market. As a major provider of homes for Londoners we also understand the need to provide sustainable, well designed, affordable and homes that our customers can be proud of.

NHHT welcomes the publication of the Mayor's draft London Plan. NHHT recognises the ambition of this new London Plan and also welcomes the clear strategic direction the Plan provides. NHHT welcomes and supports the London Plan's aim to tackle inequality and its new focus on housing delivery. The Mayor's Good Growth standards ensure sustainable and responsible growth through the promotion of tangible housing, economical, cultural and sustainable policies.

NHHT welcome the opportunity to comment on the draft London Plan. The comments that are provided in this response relate to two key themes:

1. The delivery of affordable housing in London
2. Ensuring that the homes we build are affordable for NHHT residents.

We do not provide commentary on each policy and only respond to those that impact upon the two criteria set out above. It is expected that the comments made in this letter of representation will be considered by the London Plan Team and by independent Planning Inspector. The chapters that we have considered most impactful on the delivery of affordable homes and affordability are:

Chapter 3 Design
Chapter 4 Housing



Chapter 5 Social Infrastructure
Chapter 6 Economy
Chapter 8 Green Infrastructure and Natural Environment
Chapter 9 Sustainable Infrastructure

We trust that you will be able to incorporate the listed comments into a revised Draft London Plan and would be happy to discuss these with you further should you find this of assistance. If you have any queries, please do not hesitate to contact me.

Yours Sincerely

Kelly Harris
Head of Development Planning
Notting Hill Housing Trust

Chapter/policy	Policy text	Comment
<p>Chapter 3 Design</p> <p>Policy D1 London's form and characteristics</p>	<p>Development Plans, area-based strategies and development proposals should address the following:</p> <p>A. The form and layout of a place should</p> <ol style="list-style-type: none"> 1. use land efficiently by optimising density, connectivity and land use patterns 2. facilitate an inclusive environment 3. be street-based with clearly defined public and private environments 4. deliver appropriate outlook, privacy and amenity 5. achieve safe and secure environments 6. provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7. provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8. encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9. help prevent or mitigate the impacts of noise and poor air quality 10. facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on <p>B. Development design should:</p> <ol style="list-style-type: none"> 1. respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2. be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3. aim for high sustainability standards 4. respect, enhance and utilise the heritage assets and architectural features that make up the local character 5. provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water achieve comfortable and inviting environments both inside and outside buildings. 	<p>NHHT supports Policy D1 and considers that these are good aspirational standards that should be considered when designing new buildings in London. The acknowledgement of optimising density is welcome; however there may be a need to provide further guidance where this could be seen to be at odds with the requirement to relate to local context, scale and character. In circumstances where a new development challenges the scale of the existing context, NHHT would suggest that this policy should be applied flexibly against the ability of the proposal to meet residential design requirements and achieve high quality design.</p>
<p>Chapter 3 Design</p> <p>Policy D2 Delivering good design</p>	<p>Initial evaluation</p> <p>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:</p> <ol style="list-style-type: none"> 1. socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) 2. housing type and tenure 3. urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) 4. transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned) 5. air quality and noise levels 6. open space networks, green infrastructure, and water bodies 7. historical evolution and heritage assets (including an assessment of their significance and contribution to local character) 8. topography and hydrology 9. land availability 10. existing and emerging development plan designations 11. existing and future uses and demand for new development, including housing requirements and social infrastructure. 	<p>NHHT welcomes Policy D2 Delivering good design and supports the process of Design Reviews, as identified in parts F and G, to assess and inform pre-application design options. Having engaged in design review processes across a number of boroughs, NHHT is concerned about the criteria upon which design is scrutinised and also those who are selected to sit on Design Review Panels.</p> <p>NHHT is committed to driving out high quality design, but often has to consider the impact of high specification and expensive/impractical design features in light of our desire to deliver the maximum amount of affordable housing. NHHT also are driven to ensure that planning designs do not create affordability burdens for our residents.</p> <p>It is our experience that Design Review panels consists of architects (and on occasion landscape architects/sustainability consultants) who often do not appreciate nor consider the impact of high specification, impractical and often complex design on the resident's enjoyment of their home, the resident's ability to afford their home and the impact of expensive design on scheme viability. NHHT is of the view that good design does not have to be expensive; however we often receive comments in design reviews that are in opposition to this. These challenges are unique to the RP sector and therefore not necessarily typical of the challenges many architects are used to when designing or critiquing private led-led schemes.</p> <p>NHHT is committed to delivering high quality affordable homes and would impress upon the Mayor the need for Local Planning Authorities to include a Champion for Affordability either on Design Review Panels or at some part in the Design Review process.</p>

Chapter/policy	Policy text	Comment
	<p>Determining capacity for growth</p> <p>B. The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised.</p> <p>Design analysis and visualisation</p> <p>C. Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process.</p> <p>Design quality and development certainty</p> <p>D. Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics.</p> <p>Design scrutiny</p> <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> 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 <p>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:</p> <ol style="list-style-type: none"> 1. design reviews are carried out transparently by independent experts in relevant disciplines 2. design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme 3. where a scheme is reviewed more than once, subsequent design reviews reference and build on recommendations of previous design reviews 4. design review recommendations are appropriately recorded and communicated to officers and decision makers 5. schemes show how they have considered and addressed the design review recommendations 6. planning decisions demonstrate how design review been addressed. <p>Maintaining design quality</p> <p>H. The design quality of development should be retained through to completion by:</p> <ol style="list-style-type: none"> 1. having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments 2. ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design 3. avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter 4. local planning authorities using architect retention clauses in legal agreements where appropriate. 	<p>NHHT would also ask the Mayor to consider providing greater clarity or specific guidance on the requirement to identify key construction details in planning applications. NHHT agrees that construction materials should be identified in order to ensure that quality can be maintained, however we would assert that the current drafting of the policy could lead to LPAs to requesting construction specification details. Like many developers, NHHT's preferred construction procurement contract is a Design and Build, by which we are able to control the quality of the build whilst ensuring most value for money. If we are required to provide material specification, this can impede upon our ability to negotiate best value for money in the delivery of affordable homes in London.</p> <p>Where we can NHHT will look to retaining architects for as long as possible in the delivery of our homes. We would however ask for the Mayor to reconsider part H4, where the policy encourages LPAs to use architectural retention clauses in legal agreements. As beneficiaries of public funds, NHHT must comply with the 2015 Public Contracts Regulations. The appointment of any consultant or designer is governed by these regulations and as we have to demonstrate most value for money throughout all procurement exercises. The requirement under part H4 would make it very difficult for NHHT and other RPs to comply with procurement regulation and we would ask that this is removed from the policy.</p>
Chapter 3	A. To optimise the development of housing on sites across London a range of housing	NHHT is extremely supportive of Policy D4 Housing quality and standards . NHHT's own design

Chapter/policy	Policy text	Comment
<p>Design</p> <p>Policy D4 Housing quality and standards</p>	<p>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.</p> <p>regularly assess the need for sports and recreation facilities at the local and sub-regional level</p> <p>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.</p> <p>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.</p> <p>D. Housing developments are required to meet the minimum standards below. These standards apply to all tenures and all residential</p> <p>Private internal space</p> <p>A. Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.</p> <p>B. A dwelling with two or more bed-spaces 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.</p> <p>C. A one bed-space single bedroom must have a floor area of at least 7.5 sqm and be at least 2.15m wide.</p> <p>D. A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sqm.</p> <p>E. Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area</p> <p>F. 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.</p> <p>G. 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.</p> <p>H. The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling</p> <p>Private outside space</p> <p>I. 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.</p> <p>J. The minimum depth and width for all balconies and other private external spaces should be 1.5m</p> <p>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 <u>Policy D1 London's form and characteristics</u> than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.</p> <p>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.</p> <p>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.</p>	<p>guidance follows many of the requirements as set out in the policy. We are keen to review the Mayor's guidance on the implementation of this policy on those affordable housing tenures. As discussed in the comments under Policy D2 Delivering good design, we are keen to ensure that good design is reviewed in context of providing quality living accommodation. As an active property developer and affordable housing provider we understand the value of providing useful and liveable spaces for our residents and understand the balance that needs to be struck between good architecture and providing sensible practical living accommodation.</p>

Chapter/policy	Policy text	Comment
<p>Chapter 3 Design</p> <p>Policy D6 Optimising housing density</p>	<p>The Mayor will produce guidance on the implementation of this policy for all housing tenures.</p> <p>A. Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:</p> <ol style="list-style-type: none"> 1. the site context 2. its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL) 3. the capacity of surrounding infrastructure. <p>Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.</p> <p>B. The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth.</p> <ol style="list-style-type: none"> 1. The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels. 2. The ability to support proposed densities through encouraging active travel should be taken into account. 3. Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly. <p>C. The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in <u>Policy D4 Housing quality and standards</u>, and the proposed ongoing management. Development proposals with a residential component that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of <u>Policy D2 Delivering good design</u> and submit a management plan if the proposed density is above:</p> <ol style="list-style-type: none"> 1. 110 units per hectare in areas of PTAL 0 to 1; or 2. 240 units per hectare in areas of PTAL 2 to 3; or 3. 405 units per hectare in areas of PTAL 4 to 6. <p>D. The following measures of density should be provided for all planning applications that include new residential units:</p> <ol style="list-style-type: none"> 1. number of units per hectare 2. number of habitable rooms per hectare 3. number of bedrooms per hectare 4. number of bedspaces per hectare. <p>E. The following additional measures should be provided for all major planning applications :</p> <ol style="list-style-type: none"> 1. the Floor Area Ratio (total Gross External Area of all floors / site area) 2. the Site Coverage Ratio (Gross External Area of ground floors /site area) 3. the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level). <p>These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.</p>	<p>NHHT is encouraged to see Policy D6 Optimising housing density feature in the new draft London Plan. We would welcome further clarity on part B3, where it is suggested that development is phased. It is not clear if this relates only to larger, multi-phased developments or whether this will apply to all sites. If the latter, we would ask for the Mayor to provide further guidance on how this would relate to those schemes that deliver a single mixed tenure building or a smaller single phased sites where affordable homes are included in his 2016-21 Homes for London Affordable Homes Programme.</p> <p>It is noted that part C places a requirement on applicants to provide a management plan where proposals exceed density criteria and are held to higher design standards. As well as developing our own homes, NHHT also acquire those Section 106 affordable homes on private development sites. As mentioned in the comments to Policy D2 Delivering good design, NHHT is always keen to strike a careful balance between a higher design specification and affordability. We would welcome greater clarity on how the Mayor will test the veracity of a management plan put forward by private developers for sites of this nature to ensure that the management obligations do not bear affordability constraints on those affordable residents. The supporting text to this policy sets out that running costs and service charges should be provided, however the text does not set out what is considered to be either a reasonable or an onerous cost. Guidance to developers on ways in which to minimise excessive service charges and running costs on high density and high design specification schemes would be useful here.</p>
<p>Chapter 3 Design</p> <p>Policy D7 Public realm</p>	<p>Development Plans and development proposals should:</p> <p>A. Ensure the public realm is safe, accessible, inclusive, attractive, well-connected, easy to understand and maintain, and that it relates to the local and historic context, and incorporates the highest quality design, landscaping, planting, street furniture and surfaces.</p> <p>B. Maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space. This includes design</p>	<p>NHHT is supportive of the creation of well designed and inclusive public realm. We would reiterate the comments made under Policy D6 Optimising housing density in respects to Part G.</p>

Chapter/policy	Policy text	Comment
	<p>that reduces the impact of traffic noise and encourages appropriate vehicle speeds.</p> <p>C. Be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists.</p> <p>D. Ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings.</p> <p>E. Ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm.</p> <p>F. Ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.</p> <p>G. Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter.</p> <p>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.</p> <p>I. Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.</p> <p>J. Explore opportunities for innovative approaches to improving the public realm such as open street events.</p> <p>K. Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm.</p> <p>L. Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be regular, convenient and accessible.</p> <p>M. Ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm.</p>	
<p>Chapter 3 Design</p> <p>Policy D11 Fire safety</p>	<p>A. In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:</p> <ol style="list-style-type: none"> 1. are designed to incorporate appropriate features which reduce the risk to life in the event of a fire 2. are constructed in an appropriate way to minimise the risk of fire spread 3. provide suitable and convenient means of escape for all building users 4. adopt a robust strategy for evacuation which all building users can have confidence in 5. provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. 	<p>NHHT is pleased to note that the new London Plan introduces a policy on fire safety. NHHT is committed to ensuring that the homes we build keep our residents safe in the event of a fire. We have already begun to incorporate fire safety features that exceed Building Regulation requirements and also are in alignment with DCLG advice. NHHT now ensures that all of our new buildings are designed to incorporate an entirely non combustible insulation material. This type of insulation was not as widely used by the construction industry and therefore presenting new challenges in NHHT's ability to achieve the required 10% over part L as stated in the explanatory text to Policy S12 Minimising greenhouse gas emissions. A more detailed explanation will be provided in comments to Policy S12. NHHT welcome further clarity on the Mayor's view on the interrelationship between the current fire prevention construction methodologies and the Mayor's new fabric improvement targets.</p>

Chapter/policy	Policy text	Comment
	<p>B. All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor.</p> <p>The statement should detail how the development proposal will function in terms of:</p> <ol style="list-style-type: none"> 1. the building's construction: methods, products and materials used 2. the means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated management plan approach 3. access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these 4. how provision will be made within the site to enable fire appliances to gain access to the building. 	
<p>Chapter 4 Housing</p> <p>Policy H1 Increasing housing supply</p>	<p>C. Table 4.1 sets the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents.</p> <p>D. To ensure that ten-year housing targets are achieved:</p> <ol style="list-style-type: none"> 1. boroughs should prepare delivery-focused Development Plans which: <ol style="list-style-type: none"> a. allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification b. encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2 c. enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA. 2. boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: <ol style="list-style-type: none"> a. sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary^[35] b. mixed-use redevelopment of car parks and low-density retail parks c. housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses d. the redevelopment of surplus utilities and public sector owned sites e. small housing sites (see Policy H2 Small sites) f. industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function. <p>E. Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.</p> <p>F. Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 which identify the sources of housing capacity (including windfall) expected to contribute towards achieving housing targets and should work with the Mayor to resolve any anticipated shortfalls.</p> <p>G. Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.</p> <p>H. On sites that are allocated for residential and mixed-use development there is a</p>	<p>NHHT welcome the increased annual housing target of 64,935 from 42,389 as an important step towards closing the gap between housing need and delivery.</p> <p>This figure is double the ten year average completion figure while it is only 34% higher than the ten year average permission figure. This suggests that the conversion of permissions to completions is as critical a factor in increasing London's land supply as increasing land supply. It is not feasible that this target will be met without a significant increase in affordable housing and build to rent to overcome local absorption rates.</p> <p>NHHT is in support of the Mayor's view that brownfield sites within an 800m proximity to a Tube station and within planned PTAL levels of 3-6 should be identified in Development Plans and considered suitable for housing delivery as stated in part B2a. NHHT agrees that de-risking development with new transport infrastructure is vital, however would question whether it will be viable for developments to fund this infrastructure.</p>

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	<p>general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.</p>	
<p>Chapter 4 Housing</p> <p>Policy H2 Small sites</p>	<p>A. Small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making in order to:</p> <ol style="list-style-type: none"> 1. significantly increase the contribution of small sites to meeting London's housing needs 2. diversify the sources, locations, type and mix of housing supply 3. support small and medium-sized housebuilders 4. support those wishing to bring forward custom, self-build and community-led housing. <p>B. Boroughs should:</p> <ol style="list-style-type: none"> 1. recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments 2. prepare area-wide design codes to promote good design and to proactively encourage increased housing provision and higher residential densities on small housing developments. Design codes should provide clear guidelines and parameters for small housing developments and show how additional housing provision can be accommodated in different locations, drawing on the principles set out in this policy and Supplementary Planning Guidance provided by the GLA. <p>C. Boroughs should increase planning certainty on small sites by:</p> <ol style="list-style-type: none"> 1. identifying and allocating appropriate small sites for residential development 2. listing these sites on their brownfield registers 3. granting permission in principle on specific sites or preparing local development orders. <p>D. To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:</p> <ol style="list-style-type: none"> 1. infill development on vacant or underused sites 2. proposals to increase the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary through: <ol style="list-style-type: none"> a. residential conversions b. residential extensions c. the demolition and redevelopment of existing buildings d. infill development within the curtilage of a house 3. the redevelopment or upward extension of flats and non-residential buildings to provide additional housing. <p>E. For the purposes of part D, the presumption in favour of small housing developments means approving small housing developments which are in accordance with a design code developed in accordance with part B. Where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.</p> <p>F. The presumption in favour of small housing developments should not be applied to:</p> <ol style="list-style-type: none"> 1. statutory listed buildings 2. developments providing more than 25 homes 3. proposals that do not provide net additional housing 4. sites of more than 0.25 hectares in size 5. non-self contained housing schemes 6. mixed-use proposals within the Central Activities Zone (CAZ) 7. estate regeneration schemes. 	<p>NHHT welcome all measures to encourage more efficient use of land NHHT is concerned that the London Plan relies too heavily on small sites to avoid the de-designation of Green Belt sites and to ease pressure on industrial land. Small sites have provided on average 11,700 units per annum over the past ten years. This constitutes 36% of average completions over the same period. The target of 24,573 homes per annum from small sites is ambitious. It is questionable whether small and medium sized developers, (particularly smaller Registered Providers) to whom this policy is targeted, would be willing to enter into lengthy planning battles on sites of this nature to push the density to levels necessary to achieve the target. More consideration should be given to the managed and sensible release of suitable green belt land, particularly where genuinely affordable homes can be delivered away from the rising property values of inner London in order to meet the overall target of 65k.</p>

Chapter/policy	Policy text	Comment
	<p>G. New build homes on sites capable of accommodating ten units or fewer which are on the ground floor should meet M4(2) standard for 'accessible and adaptable dwellings' and provide step-free access. New build homes on these sized sites that are not on the ground floor do not need to meet M4(2) standards and can comply with the M4(1) standard, which does not require step-free access.</p> <p>H. Boroughs wishing to apply affordable housing requirements to sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions. Boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development.</p>	
<p>Chapter 4 Housing</p> <p>Policy H5 Delivering affordable housing</p>	<p>A. The strategic target is for 50 per cent of all new homes delivered across London to be affordable. Specific measures to achieve this aim include:</p> <ol style="list-style-type: none"> 1. requiring residential and mixed-use developments to provide affordable housing through the threshold approach (Policy H6 Threshold approach to applications) 2. using grant to increase affordable housing delivery beyond the level that would otherwise be provided 3. affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio 4. public sector land delivering at least 50 per cent affordable housing across its portfolio 5. strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio. <p>B. Affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.</p>	<p>NHHT supports the Mayor's strategic target to deliver 50% affordable homes across London.</p>
<p>Chapter 4 Housing</p> <p>Policy H6 Threshold approach to applications</p>	<p>F. The threshold approach applies to development proposals which are capable of delivering more than ten units or which have a combined floor space greater than 1,000 sqm (see paragraph 4.6.14 for exclusions to the threshold approach and 4.6.15 for scheme types with bespoke approaches).</p> <p>G. The threshold level of affordable housing is initially set at:</p> <ol style="list-style-type: none"> 1. a minimum of 35 per cent 2. 50 per cent for public sector land 3. 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function). <p>The 35 per cent threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance.</p> <p>C. To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:</p> <ol style="list-style-type: none"> 1. meet or exceed the relevant threshold level of affordable housing on site without public subsidy 2. be consistent with the relevant tenure split (Policy H7 Affordable housing tenure) 3. meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant 4. demonstrate that they have taken account of the strategic 50 per cent target in Policy H5 Delivering affordable housing and have sought grant where required to increase the level of affordable housing beyond 35 per cent. <p>D. Fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the</p>	<p>NHHT welcomes the Mayor's threshold approach to the delivery of affordable housing in development proposals. NHHT is also supportive of greater transparency in the planning system and particularly in the field of financial viability assessments</p> <p>NHH questions how developers would demonstrate that they have taken account of the strategic 50 per cent target in the absence of an FVA as noted in part C4 of the policy.</p> <p>NHHT also supports the reopening of the development viability in a Section 73 planning application where there is a proposed reduction to affordable housing. Equally the policy should make it clear that if there is a proposed increase in the number of permitted homes without a proportional increase in the permitted levels affordable housing then this too should be subject to a viability review.</p>

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	<p>requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough).</p> <p>E. Where an application does not meet the requirements set out in part C it must follow the Viability Tested Route. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:</p> <ol style="list-style-type: none"> 1. the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG 2. viability tested schemes will be subject to: <ol style="list-style-type: none"> a. an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough) b. a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough) c. Mid Term Reviews prior to implementation of phases for larger phased schemes. <p>F. Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG.</p> <p>Scheme amendments – Section 73 applications and deeds of variations</p> <p>G. For schemes that were approved under the Fast Track Route, any subsequent applications to vary the consent will not be required to submit viability information, providing the resultant development continues to meet the relevant threshold and the criteria in part C.</p> <p>H. For schemes where the original permission did not meet the threshold or required tenure split, viability information will be required where an application is submitted to vary the consent and this would alter the economic circumstances of the scheme. Such cases will be assessed under the Viability Tested Route.</p> <p>I. Any proposed amendments that result in a reduction in affordable housing, affordability or other obligations or requirements of the original permission should be rigorously assessed under the Viability Tested Route. In such instances, a full viability review should be undertaken that reconsiders the value, costs, profit requirements and land value of the scheme.</p> <p>J. The Mayor should be consulted on any proposed amendments on referable schemes that change the level of affordable housing from that which was secured through the original planning permission.</p>	
<p>Chapter 4 Housing</p> <p>Policy H7 Affordable housing tenure</p>	<p>N. The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:</p> <ol style="list-style-type: none"> 1. a minimum of 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent) 2. a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership 3. 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing. <p>O. These minimums will be reviewed in 2021, and if necessary, updated through Supplementary Planning Guidance.</p> <p>B. Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability.</p>	<p>NHHT supports the Mayor's commitments to ensure that genuinely affordable homes are delivered through the planning system. We also welcome the flexibility offered by H7.A.3 but encourage greater liaison between LPAs and RPs to give more certainty on how the 40% will be applied. NHHT encourages LPAs to clarify their approach in affordable housing SPGs. We would request that this policy stipulates that where a different tenure split is agreed with the borough according to local need/site circumstance/funding of transport infrastructure as noted in our comments to Policy H1, that this should also be eligible for the Fast Track route.</p>

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<p>Chapter 4 Housing</p> <p>Policy H10 Redevelopment of existing housing and estate regeneration</p>	<p>A. Loss of existing housing is generally only acceptable where the housing is replaced at existing or higher densities with at least the equivalent level of overall floorspace. This includes the loss of hostels, staff accommodation, and shared and supported accommodation that meet an identified housing need, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.</p> <p>B. Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, and generally should produce an uplift in affordable housing provision. All such schemes are required to follow the Viability Tested Route (see Policy H6 Threshold approach to applications).</p> <p>C. For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised. All schemes should follow the Viability Tested Route (see Policy H6 Threshold approach to applications).</p>	<p>NHHT supports the Mayor's objective to ensure that an equivalent level of existing affordable housing floorspace is provided on future estate regeneration schemes. NHHT would welcome the Mayor to also recognise that this may also be dependent on available funding and other community benefits that estate regeneration could bring.</p> <p>NHHT also supports the transparency of viability and the other related competing objectives inherent to holistic regeneration.</p>
<p>Chapter 4 Housing</p> <p>Policy H12 Housing size mix</p>	<p>A. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:</p> <ol style="list-style-type: none"> 1. the range of housing need and demand identified by the London Strategic Housing Market Assessment and, where relevant, local assessments 2. the requirement to deliver mixed and inclusive neighbourhoods 3. the need to deliver a range of unit types at different price points across London 4. the mix of uses in the scheme 5. the range of tenures in the scheme 6. the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in more central or urban locations 7. the aim to optimise housing potential on sites 8. the ability of new development to reduce pressure on conversion and sub-division of existing stock 9. the role of one and two bed units in freeing up family housing 10. the potential for custom-build and community-led housing schemes. <p>B. Generally, schemes consisting mainly of one-person units and/or one-bedroom units should be resisted.</p> <p>C. Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.</p> <p>D. For low cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:</p> <ol style="list-style-type: none"> 1. the criteria set out in part A 2. the local and strategic need for affordable family accommodation 3. local issues of overcrowding 4. the impact of welfare reform 5. the cost of delivering larger units and the availability of grant. 	<p>NHHT welcome the proposal to encourage greater flexibility in dwelling size mix requirements with the aim that individual schemes can better respond to local need while balancing the need to use land effectively. We recognise the contribution smaller units can make to enable smaller households to form that would previously have been within family accommodation or converted family accommodation. LPAs should be encouraged to identify suitable sites for retirement homes and supported housing schemes as an increased supply of such dwellings could contribute to freeing up family housing.</p>
<p>Chapter 4 Housing</p> <p>Policy H14 Supported and specialised accommodation</p>	<p>A. The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London's population, including disabled Londoners (see Policy D5 Accessible housing). Supported and specialised accommodation could include:</p> <ol style="list-style-type: none"> 1. move-on accommodation for people leaving hostels, refuges and other supported housing, to enable them to live independently 2. accommodation for young people 	<p>As mentioned in response to Policy H12 Housing size mix, NHHT would support the LPAs identifying suitable sites in their Strategic Site Allocations as providing specialised housing can make an important contribution to freeing up general needs family housing.</p>

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	<ol style="list-style-type: none"> 3. re-ablement accommodation (intensive short-term) for people who are ready to be discharged from hospital but who require additional support to be able to return safely to live independently at home, or to move into appropriate long-term accommodation 4. accommodation for disabled people (including people with physical and sensory impairments and learning difficulties) who require additional support or for whom living independently is not possible. 5. accommodation (short-term or long-term) for people with mental health issues who require intensive support 6. accommodation for rough sleepers 7. accommodation for victims of domestic abuse 8. accommodation for victims of violence against women and girls. 	
<p>Chapter 4 Housing</p> <p>Policy H15 Specialist older persons housing</p>	<p>A. Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of:</p> <ol style="list-style-type: none"> 1. local and strategic housing needs information and the indicative benchmarks set out in Table 4.4 2. the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, access to social infrastructure, health care and public transport facilities 3. the increasing need for accommodation suitable for people with dementia. <p>B. Specialist older persons housing (Use Class C3) provision should deliver:</p> <ol style="list-style-type: none"> 1. affordable housing in accordance with Policy H5 Delivering affordable housing, and Policy H6 Threshold approach to applications 2. accessible housing in accordance with Policy D5 Accessible housing 3. the highest standards of accessible and inclusive design in accordance with Policy D3 Inclusive design 4. suitable levels of safe storage and charging facilities for residents' mobility scooters 5. pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs) minibuses and ambulances. <p>C. Sheltered accommodation and extra care accommodation is considered as being in Use Class C3. Residential nursing care accommodation (including end of life/ hospice care and dementia care home accommodation) is considered as being in Use Class C2.</p>	<p>As mentioned in response to Policy H12 Housing size mix , providing specialised housing can make an important contribution to freeing up general needs family housing. LPAs should identify suitable sites in their SSAs. It is appropriate that these sites are close to centres with day-to-day amenities, good social infrastructure and accessible public transport.</p> <p>There is also value to ensure communities are mixed in terms of the age of their populations. NICE Guideline NG32 published Dec 2015 "Improving the mental wellbeing of older people and helping them to retain their independence can benefit families, communities and society as a whole". Estate regeneration schemes should investigate opportunities for including specialist older persons housing as part of achieving balanced communities. NHHT is of the view that the Mayor should include a requirement to consider on site older persons housing in regeneration schemes whereby the provision of these homes could assist in relieving tensions on the subdivision/ conversion of existing stock as identified in Policy H12 Housing size mix.</p>
<p>Chapter 5 Social Infrastructure</p> <p>Policy S1 Developing London's social infrastructure</p>	<p>I. Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities.</p> <p>J. In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans.</p> <p>K. Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.</p> <p>L. Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.</p> <p>M. New facilities should be easily accessible by public transport, cycling and walking.</p> <p>N. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:</p> <ol style="list-style-type: none"> 1. there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or; 2. the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services. <p>O. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.</p>	<p>NHHT welcome boroughs providing updated and detailed assessments of social infrastructure needs through their area based on the borough ten year housing targets as evidenced through the London –wide Strategic Housing Market Assessment.</p> <p>NHHT acknowledges and supports the increase in housing completion targets and would emphasise that the demand and subsequent delivery of social infrastructure needs to be accounted for in up to date borough Regulation 123 Lists or within site allocation development plan documents. NHH would emphasise that only in exception circumstances should unallocated sites be required to provide on-site social infrastructure or pay additional financial contributions towards social infrastructure if they are providing a minimum of 35% on site affordable housing.</p> <p>The supporting text to Policy S1 Developing London's social infrastructure suggests that boroughs should prevent the loss of social infrastructure facilities and in doing so should consider the designation of a facility as an "Asset of Community Value" if put forward by the local community. NHHT supports designations of this type on the basis that consultation with the property owner and liaison with borough planning policy teams are co-ordinated to ensure that any emerging or proposed redevelopment of the area is taken into consideration. As well as transparency on the criteria used to inform the designation the right of appeal and compensation for property owners should also be made available.</p>

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<p>Chapter 6 Economy</p> <p>Policy E3 Affordable workspace</p>	<p>P. In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:</p> <ol style="list-style-type: none"> 1. dedicated for specific sectors that have social value such as charities or social enterprises 2. dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces 3. dedicated for disadvantaged groups starting up in any sector 4. providing educational outcomes through connections to schools, colleges or higher education 5. supporting start-up businesses or regeneration. <p>Q. Particular consideration should be given to the need for affordable workspace for the purposes in part A above:</p> <ol style="list-style-type: none"> 1. where there is existing affordable workspace on-site 2. in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones) 3. in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area. <p>R. Boroughs, in their Development Plans, are encouraged to consider more detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace.</p> <p>S. Affordable workspace policies defined in Development Plans and Section 106 agreements should include ways of monitoring that the objectives in part A above are being met, including evidence that they will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage to ensure that the space is configured and managed efficiently.</p> <p>T. Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in part A, over the long term.</p> <p>U. The affordable workspace elements of a mixed-use scheme should be operational prior to residential elements being occupied.</p>	<p>NHHT supports the Mayor's policy to ensure that affordable workspace is provided for SMEs in London. NHH would request that the requirement to place restrictions on the occupation of residential elements of a development is reconsidered. NHHT would emphasise that a restriction of this nature could create an unintended impact on local authority homeless waiting lists as well as to those shared ownership residents who are reliant on mortgages in principal. Commercial space end users often negotiate significant lead in times due to their bespoke fit out requirements. Retaining this flexible approach to commercial lettings will ensure the spaces are attractive to end users. NHHT would therefore support a policy that omitted this requirement</p>
<p>Chapter 6 Economy</p> <p>Policy E4 Land for industry, logistics and services to support London's economic function</p>	<p>A. A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained. This should make provision for:</p> <ol style="list-style-type: none"> 1. light and general industrial uses 2. storage and logistics/distribution including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points 3. secondary materials and waste management 4. utilities infrastructure 5. land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure 6. wholesale markets 7. emerging industrial-related sectors 8. flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population 9. low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Low-cost business space) taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function). <p>B. London's land and premises for industry, logistics and services falls into three</p>	<p>NHHT support the crucial role SIL and LSIS play in supporting London's industrial and logistic economy and in providing jobs for Londoners.</p>

Chapter/policy	Policy text	Comment
	<p>categories:</p> <ul style="list-style-type: none"> A. Strategic Industrial Locations (SIL) – see Policy E5 Strategic Industrial Locations (SIL) B. Locally Significant Industrial Sites (LSIS) - see Policy E6 Locally Significant Industrial Sites C. non-Designated Industrial Sites⁷⁸ - see below <p>C. The retention and provision of industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, colocation and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function.</p> <p>D. The retention and provision of additional industrial capacity should be prioritised in locations that:</p> <ul style="list-style-type: none"> A. are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport B. provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London’s economy and population C. provide capacity for micro, small and medium-sized enterprises D. are suitable for ‘last mile’ distribution services to support large-scale residential or mixed-use developments subject to existing provision. <p>E. Any release of industrial capacity in line with part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.</p> <p>F. Efficient wholesale market functions should be retained to meet London’s requirements whilst enabling opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.</p> <p>G. Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.</p> <p>H. Development proposals for large-scale (greater than 2,500 sqm GIA) industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs, in particular where there is a local shortage and demand for such space.</p>	
<p>Chapter 6 Economy</p> <p>Policy E5 Strategic Industrial Locations (SIL)</p>	<p>C. Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London’s main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London’s economy.</p> <p>D. Boroughs, in their Development Plans, should:</p> <ol style="list-style-type: none"> 1. define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function), and use the adopted Local Plan SIL boundary as the basis for decision-making 2. develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including access improvements and digital connectivity) for the functions set out in part C 3. explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Intensification, 	<p>In line with our comments on Policy E4 Land for industry, logistics and services to support London’s economic function NHH supports London-based industrial and logistical functions. To reiterate our response to Policy H1 Increasing housing supply, NHHT also recognise and welcome the increased London annual housing target to 64,935 homes.</p> <p>As well as encouraging the sensible release of green-belt land, NHHT would also support the release of land within Strategic Industrial Locations (SIL) in order to achieve the London –wide annual housing completion target. NHHT are of the view that the sensible release of SIL should only be encouraged where there is a co-ordinated consolidation of SIL. NHHT supports the analysis of SIL’s to establish areas which are surplus to requirements or potential to rationalise either in elsewhere in London or in other areas such as growth corridors. NHHT agree that SIL land should only be released where it is clear that the land is vacant, under used, not fit for purpose and/or and where the potential for residential development and the delivery of affordable housing can be maximised.</p>

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	<p>colocation and substitution of land for industry, logistics and services to support London's economic function).</p> <p>E. Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:</p> <ol style="list-style-type: none"> 1. light industrial (Use Class B1c) 2. general industrial uses (Use Class B2) 3. storage and logistics/distribution uses (Use Class B8) 4. other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets 5. flexible B1c/B2/B8 premises suitable for occupation by SMEs small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés. <p>F. Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.</p> <p>G. Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.</p>	
<p>Chapter 6 Economy</p> <p>Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</p>	<p>A. Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:</p> <ol style="list-style-type: none"> A. development of mezzanines B. introduction of small units C. development of multi-storey schemes D. addition of basements E. more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary. <p>B. Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should only be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.</p> <p>C. Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below. This approach should only be</p>	<p>NHHT supports the partial release of LSIS where businesses uses can be intensified or where the land can be used more efficiently. Where this can be accommodated, NHHT is supportive of LPAs identifying LSIS sites in development plans that are capable of mixed-use and residential development where a consolidated approach to industrial and business uses can be applied. An overall master planning approach would provide a framework and vision for an area which NHH would strongly encourage. Where appropriate NHH would support the opportunity to reconfigure the land and implement well thought out mixed use developments.</p> <p>NHHT would also encourage the Mayor and LPAs to consider the type of residential accommodation that would be suitable in locations. NHHT is of the view that density should be encouraged in sites of this nature; however larger homes may not always be suitable in these types of locations where direct access to green space, play provision etc. may not be possible and/or where development land is constrained due to its mixed-use nature.</p>

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	<p>considered as part of a plan-led process of LSIS intensification and consolidation (and clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.</p> <p>D. Mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:</p> <ul style="list-style-type: none"> A. there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London's economic function; or B. it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or C. industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or D. suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development. <p>Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below.</p> <p>E. The processes set out in Parts B, C and D above must ensure that:</p> <ul style="list-style-type: none"> A. 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 B. 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 C. the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied D. appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to: <ul style="list-style-type: none"> 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 arrangement 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). <p>F. Development Plans and planning frameworks should consider, in collaboration with neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:</p> <ul style="list-style-type: none"> A. this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land B. full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and 	

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	<p>commuting, supply-chains and logistics, congestion, pollution and vehicle miles</p> <p>C. a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.</p> <p>This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) and not through ad hoc planning applications.</p>	
<p>Chapter 8 Green Infrastructure and Natural Environment</p> <p>Policy G5 Urban greening</p>	<p>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.</p> <p>B. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.</p>	<p>The NHH recognise the importance of ensuring development in London is carried out in as sustainable manner as possible and that are also attractive places where our residents are proud of living.</p> <p>Significant green infrastructure features such as green roofs, green walls and rain gardens often require a high degree of maintenance. The cost of maintaining green infrastructure is either passed on to the affordable housing resident (shared ownership) or by the Registered Provider in the case of Affordable Rents. The balance is therefore a delicate one for NHHT, who is driven to maintain affordability of the new homes we build, to maximise the provision of affordable housing and also directly manage the sites we build. Density plays a key role in the delivery of urban greening, where more homes delivered on a site allows for a more equitable spread of lower charges.</p> <p>We would ask that this policy and the Urban Greening Factor score is applied flexibly where it comes to schemes that offer a minimum 35% proportion of affordable homes and are of a relatively low density.</p>
<p>Chapter 9 Sustainable Infrastructure</p> <p>Policy SI1 Improving air quality</p>	<p>A. London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:</p> <ol style="list-style-type: none"> 1. Development proposals should not: <ol style="list-style-type: none"> a. lead to further deterioration of existing poor air quality b. create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits c. reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality d. create unacceptable risk of high levels of exposure to poor air quality. 2. Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people. 3. The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral. 4. Development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance. 5. Air Quality Assessments (AQAs) should be submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use. 6. Development proposals should ensure that where emissions need to be reduced, this is done on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated. 	<p>NHHT support the aspiration of this policy, however we await the proposed further guidance on Air Quality Neutral, Air Quality Positive standards and impact reduction methods, in order to better understand the practical implications for residential developers such as ourselves. In particular we would hope to see further detail as to the GLA's expectations and/or parameters around the use of off-site air quality improvement measures.</p>
<p>Chapter 9 Sustainable Infrastructure</p>	<p>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:</p> <ol style="list-style-type: none"> 1. Be lean: use less energy and manage demand during construction and 	<p>NHHT support the Mayor's ambitious objective to make London a zero-carbon city. NHHT welcome policy objectives that aim to improve the overall affordability of customer's homes and lowering the cost energy consumption speaks to our social purpose.</p>

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<p>Policy SI2 Minimising greenhouse gas emissions</p>	<p>operation.</p> <ol style="list-style-type: none"> 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. <p>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.</p> <p>C. In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations117 is expected. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided:</p> <ol style="list-style-type: none"> 1. through a cash in lieu contribution to the relevant borough’s carbon offset fund, and/or off-site provided that an alternative proposal is identified and delivery is certain. <p>D. Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.</p>	<p>As noted in our comments to Policy D11 Fire safety, NHHT is committed to ensuring customer safety in the case of fire. Our current work on fire safety design has seen the regular use of a non-combustible insulation element within our construction schematics. This material in conjunction with traditional masonry construction has led to greater heat losses and building fabric performance falling below the required 10% improvements over part L as set out in the supporting text to A1. Whilst we continue to look to improve building heat loss for our residents, NHHT consider that further consideration and greater flexibility should be given to this particular performance target until there is greater alignment between fire retardant insulation and thermal performance within the construction industry.</p> <p>NHHT is also aware that the changes to SAP 2012 proposed through the SAP 2016 consultation will, if confirmed and implemented into Building Regulations through a Part L update, have significant impacts on the ability to achieve the Mayor’s carbon reduction targets and the technologies which can be used to deliver these. We assume that the Mayor will issue further guidance on his expectations for energy strategies once SAP changes are confirmed.</p> <p>NHHT is in support of using carbon offset funds to unlock energy improvement programmes of existing London building stock in public ownership. We accept the carbon offset payment, however would propose that if the Mayor is committed to increases the carbon offset price then the increase should become banded premium which should be assessed against the levels of affordable housing that a developer proposes to deliver.</p> <p>Overall, NHHT would welcome both the GLA and LPAs to give due consideration to the London Plan’s clear position that the energy efficiency targets are “targets” for development to “aim” to achieve. We would also welcome measures to achieve carbon improvements to be considered in light of maintaining affordability and maximising on site delivery of affordable homes.</p>
<p>Chapter 9 Sustainable Infrastructure</p> <p>Policy SI3 Energy infrastructure</p>	<p>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.</p> <p>B. Energy masterplans should be developed for large-scale development locations which establish the most effective energy supply options. Energy masterplans should identify:</p> <ol style="list-style-type: none"> 1. major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing) 2. heat loads from existing buildings that can be connected to future phases of a heat network 3. major heat supply plant 4. possible opportunities to utilise energy from waste 5. secondary heat sources 6. opportunities for low temperature heat networks 7. possible land for energy centres and/or energy storage 8. possible heating and cooling network routes 9. opportunities for futureproofing utility infrastructure networks to minimise the impact from road works 10. infrastructure and land requirements for electricity and gas supplies 11. implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector. <p>C. Development Plans should:</p> <ol style="list-style-type: none"> 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. <p>D. Major development proposals within Heat Network Priority Areas should have a communal heating system</p> <ol style="list-style-type: none"> 1. the heat source for the communal heating system should be selected in accordance with the following heating hierarchy: <ol style="list-style-type: none"> 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) 	<p>NHHT supports the Mayor’s ambition to ensure energy infrastructure in London is truly sustainable. We also support the emphasis for developers to adopt a strategic approach towards the delivery of energy networks. NHHT’s priority is to establish the most appropriate and affordable energy solution for each development site, with careful consideration of site specific opportunities to connect to existing/future energy networks.</p> <p>Whilst not specifically referenced in the policy, NHHT is aware that the GLA is increasingly providing funding and practical support/guidance to boroughs on the development and implementation of local heat networks. We welcome this support as knowledge and understanding of heat networks (technical, commercial and legal) within boroughs is vital to effective delivery of networks. Where boroughs have the in-house expertise to develop energy masterplans, developers such as NHHT are able to assist them in achieving their network delivery aspirations by reducing our risk, costs and uncertainty.</p> <p>NHHT note that part D references Heat Network Priority Areas as does the associated map at Figure 9.3. We are concerned that development sites in our ownership that are in close proximity to one of these areas will be encouraged to provide communal heating in those specific cases where this may not represent the most cost effective solution for our future residents. We would encourage the Mayor to incorporate a provision within the policy that considers the affordability of proposed communal heating systems to residents as well as the viability of connecting to an established heat network and again, ensuring that this represents a best value for money option for future residents. In order to undertake this work those public or private bodies responsible for delivering the heat network will need to make available the following:</p> <ol style="list-style-type: none"> A. Technical specification B. Heat tariff rates (including service charges) <p>We wish to draw the Mayor’s attention to the fact that its aspirations for deployment of large scale heat networks are likely to be hampered by technical incompatibility in relation to heat source. In particular, we understand from our M&E engineers that different heat generation technologies dictate different flow temperatures, and system design is often locked in to higher temperature flows through sizing of pipes, HIUs, radiators, etc. We therefore have longstanding concerns about the feasibility of the GLA’s aspirations for widespread heat network connectivity – contrary to popular view, heat networks are unfortunately not entirely technology agnostic.</p> <p>Where an energy master plan or a heat network has not been established and where this information is not forthcoming, NHHT would welcome the Mayor allowing developments to bring forward their own heating</p>

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	<ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> 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. 	<p>solutions i.e. standalone heat pump systems on smaller developments.</p> <p>NHHT appreciate the aspiration of the heating hierarchy at part D, however we wish to caution that the hierarchy's preferred technologies are not yet commercially deliverable, and therefore developers like ourselves are likely to continue utilising technologies lower down the hierarchy for several years whilst technology develops and commercialises.</p> <p>Whilst electrical energy generation is not mentioned in this policy, NHHT has experienced difficulties where development has triggered a need for UKPN electrical infrastructure improvements, whereby UKPN advise that an incremental improvement is not possible and hence we are expected to fund the cost of major upgrades far in excess of those required by our own development. As indicated in our response to Policy T6.1 Residential parking, a combination of policy requirements and the general impact of new developments is causing greater pressure on electrical infrastructure. We recognise that the GLA has no jurisdiction over UKPN, however we would very much welcome any assistance the GLA or Local Planning Authorities could provide in facilitating co-ordination between developers bringing forward planning applications, to enable a more strategic and joined-up approach and the sharing of costs – thereby helping to unlock and de-risk development projects. We expect this issue to heighten in coming years with the electrification of heat and transport.</p>
<p>Chapter 10 Transport</p> <p>Policy T5 Cycling</p>	<ul style="list-style-type: none"> A. Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through: <ul style="list-style-type: none"> 1. supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure 2. securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, and should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. B. Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-street car parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision. C. Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers. D. Where flexible commercial uses are proposed and exact uses are not determined at the point of application, the highest potential applicable cycle parking standard should be applied. E. Where the final land use of a development is not determined at the point of application, the highest potential applicable cycle parking standard should be applied. F. A minimum of two short-stay and two long-stay cycle parking spaces must be provided for all land uses in all locations with the exception of Class C3-C4 uses and Class A uses where the size threshold specified in Table 10.2 has not been met. 	<p>NHHT is supportive of sustainable and healthy modes to travel. While NHHT understands the intention behind this policy, the increase in bike sharing schemes like oBike means the provision of such schemes should be viewed in the same way as car club spaces. As such it is important that it be clear that cycle provision lower than the minimum guidance is possible where the scheme has other merits including proximity to or on site provision of an adequate bike sharing scheme.</p>
<p>Chapter 10 Transport</p> <p>Policy T6 Car parking</p>	<ul style="list-style-type: none"> A. Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. B. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car- 	<p>Restricted parking policies are supported by NHHT, particularly when excessive parking requirements come at the cost of public realm or where design interventions such as basements come at excessive costs and impact upon scheme viability. NHHT would urge the Mayor to require LPAs to consider greater use of Controlled Parking Zones that could be made to minimise the risk of uncontrolled overspill parking, to control future car ownership and to encourage healthier modes of travel</p>

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	<p>lite').</p> <p>C. The maximum car parking standards set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.</p> <p>D. Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6.1 Residential parking to Policy T6.5 Non-residential disabled persons parking.</p> <p>E. Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles.</p> <p>F. Adequate provision should be made for efficient deliveries and servicing.</p> <p>G. A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on car parking management and car parking design.</p> <p>H. Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6.1 Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential land uses in any part of London.</p> <p>I. Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.</p>	<p>NHHT would encourage the Mayor to pay regard other measures of accessibility and connectivity (combined with the Healthy Streets approach) in his assessment of the minimum parking standards.</p>
<p>Chapter 10 Transport</p> <p>Policy T6.1 Residential parking</p>	<p>A. New residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category.</p> <p>B. Parking spaces within communal car parking facilities (including basements) should be leased rather than sold.</p> <p>C. All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.</p> <p>D. Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking.</p> <p>E. Large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free.</p> <p>F. The provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.</p> <p>G. Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:</p> <ol style="list-style-type: none"> 1. ensure that at least one designated disabled persons parking bay per dwelling for three per cent of dwellings is available from the outset 2. demonstrate on plan and as part of the Car Parking Design and Management Plan, how the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as designated disabled persons parking in the future. If disabled persons parking provision is not sufficient, spaces should be provided when needed either upon first occupation of the development or in the future. <p>H. All disabled persons parking bays associated with residential development must:</p> <ol style="list-style-type: none"> 1. be for residents' use only (whether M4(2) or M4(3) dwellings) 2. not be allocated to specific dwellings, unless provided within the curtilage of the dwelling 3. be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure) 4. count towards the maximum parking provision for the development 5. be designed in accordance with the design guidance in BS8300 vol. 1 6. be located to minimise the distance between disabled persons parking bays 	<p>As stated in our response to policy Policy T6 Car parking, NHHT supports the Mayor's introduction of maximum residential parking standards across London.</p> <p>NHHT would welcome further guidance on and the possible revision to the Mayor's position on the leasing of car parking spaces. The cost of car parking spaces in undercroft or basement parking is often offset by the profit from the sale of those spaces. If developments proposals are to optimise sites and deliver good design in line with policies Policy D6 Optimising housing density and Policy D2 Delivering Good Design where undercroft parking will be utilised, NHH consider that only leasing spaces will undermine the delivery of car parking where car parking is required.</p> <p>In addition to this and where this requirement relates to car-free developments, where the only parking provided are disabled spaces, NHHT would ask that flexibility is applied to the disabled parking standard as stated in part G of the policy. If parking can only be provided in undercroft parking, then those safeguarding spaces for disabled residents who may not require disabled parking upon first letting or upon initial sale, will either be leased to non-disabled residents or left empty until they are required. Where leased to non-wheelchair or non-disabled residents, then this resident may face the complication for not being able to apply for an on-street car parking permit once the space is required. Leaving spaces empty is not ideal as all residents will be paying not insubstantial service charges for partially occupied undercroft/basement area. The lease of disabled spaces adds complexity to the management of car parking and NHHT would welcome an amendment or relaxation of the requirement to lease spaces and also flexibility on safeguarding spaces where this is not practical.</p> <p>NHHT is in general support of the provision of charging points in our developments, however would urge the Mayor to reconsider the requirement to provide passive electric charging provision to all spaces that do not have active charging points. Passive provision requires sufficient electrical capacity and addition with other electrical loading requirements can lead to the increase in the size of plant rooms. Plant rooms, energy centres, cycle storage and refuse take up significant space on development plots, particularly on those development sites that seek to optimise housing density in line with Policy D6 Optimising housing density where we also seek to drive out active frontages in line with Policy D2 Delivering Good Design. Due to viability constraints, basements are not always a viable option for NHHT due to the significant operating cost burden on our residents. NHHT would welcome the reduction of this standard.</p>

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	and the dwelling or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface.	