

## **Mayor of London – London Plan: Draft for Public Consultation (December 2017)**

### **A submission by:**

**University of Southampton, University of Westminster, University of Lancaster and University College London**

### **The Freight Traffic Control 2050 project academic team**

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### **Background**

We, the above named academics, are currently working on a project entitled Freight Traffic Control (FTC) 2050 ([www.FTC2050.com](http://www.FTC2050.com)) which has received funding from the Engineering and Physical Sciences Research Council (EPSRC). Partners in the project include freight transport companies and city transport authorities (including Transport for London). The FTC2050 project is currently investigating several topics that should be considered by authorities when developing integrated urban traffic management strategies to address and mitigate congestion which specifically tackle urban freight issues. These include to:

- Work with freight carriers to study their current operations in London and to quantify the geographical patterns and extent of driving and walking on vehicle delivery journeys.
- Identify the key issues and difficulties associated with these freight transport operations from public and private sector perspectives.
- Develop new computational approaches that can enhance vehicle and walking routeing and scheduling decision-making, and to demonstrate its potential effectiveness.
- Analyse what will happen to the efficiency of these vehicle operations and their negative traffic and environmental impacts if they are subject to slower vehicle speeds and more unpredictable journey time reliability in future.

- Trial and evaluate new methods of carrying out these deliveries that involve consolidation, including the use of walking porters to receive parcels at kerbside and carry out deliveries on-foot.
- Investigate using a 'carrier's carrier' for last mile distribution where one carrier hands over goods to another to make the final deliveries using cleaner vehicles, in order to consolidate goods onto fewer delivery vehicles.
- Evaluate whether the logistics industry will be able to implement more efficient and sustainable operations in the face of pressures that include reducing road space allocation, slower vehicle speeds and logistics sprawl, or whether it will be necessary for a third-party 'Freight Traffic Controller' (which could be a private organisation or a city authority) to aid the management of vehicles over the urban last-mile for the more equitable and efficient use of road and kerbside space and time.

We have used a template that lists all the policies and proposals contained in the Mayor's Draft London Plan that we have responded to and have added our response in the right hand column, drawing on our work in the FTC2050 project. We have provided comments on the following policies:

Have included comments against the following policy points:

GG5G – page 5  
SD1A – page 6  
SD4M – page 10  
D1A – page 18  
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## Response to the New Draft London Plan by the Freight Traffic Control 2050 academic project team

Policies	Comments
<b>Policy GG1</b>	Building strong and inclusive communities To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:
<b>GG1A</b>	See to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city.
<b>GG1B</b>	Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social inclusion
<b>GG1C</b>	Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.
<b>GG1D</b>	Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.
<b>GG1E</b>	Ensure that new building and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.
<b>GG1F</b>	Support the creating of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.
<b>Policy GG2</b>	<b>Making the best use of land</b> To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:
<b>GG2A</b>	Priorities the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within or on the edge of town centres, and small sites.
<b>GG2B</b>	Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.

GG2C	Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.	
GG2D	Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.	
GG2E	Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.	
GG2F	Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.	
<b>Policy GG3</b>	<b>Creating a healthy city</b>	
	To improve Londoners' health and reduce health inequalities, those involved in planning and development must:	
GG3A	Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.	
GG3B	Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices.	
GG3C	Use the Healthy Streets Approach to prioritise health in all planning decisions.	
GG3D	Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.	
GG3E	Plan for improved access to green spaces and the provision of new green infrastructure.	
GG3F	Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.	
GG3G	See to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.	
<b>Policy GG4</b>	<b>Delivering the homes Londoners need</b>	
	To create a housing market that works better for all Londoners, those involved in planning and development must:	
GG4A	Ensure that more homes are delivered.	
GG4B	Support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.	

GG4C	Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.	
GG4D	Identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.	
GG4E	Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.	
<b>Policy GG5</b>	<b>Growing a good economy</b> To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:	
GG5A	Promote the strength and potential of the wider city region.	
GG5B	Seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London.	
GG5C	Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.	
GG5D	Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.	
GG5E	Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.	
GG5F	Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.	
GG5G	Maximise London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.	The body text of the report mentions the importance of transport "networks that allow the efficient movement of goods and people" but this policy point does not refer the importance of efficient goods and service transport to London's economy
<b>Policy GG6</b>	<b>Increasing efficiency and resilience</b> To help London become a more efficient and resilient city, those involved in planning and development must:	
GG6A	Seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050.	
GG6B	Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect.	

GG6C	Create a safe and secure environment which is resilient against the impact of emergencies including fire and terrorism.	
GG6D	Take an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.	
Policy SD1	<b>Opportunity Areas</b>	
SD1A	<p>To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:</p> <ol style="list-style-type: none"> <li>1) Provide support and leadership for the collaborative preparation and implementation of planning frameworks that: <ol style="list-style-type: none"> <li>a) Set out a clear strategy for accommodating growth</li> <li>b) Assist in delivering specific infrastructure requirements that unlock capacity for new homes and jobs</li> <li>c) Support regeneration</li> <li>d) Are prepared in a timely manner</li> </ol> </li> <li>2) Bring together the range of investment and intervention needed to deliver the vision and ambition for the area</li> <li>3) Support and implement adopted planning frameworks, in order to give them appropriate material weight in planning decisions</li> <li>4) Ensure that his agencies (including Transport for London) work together and with others to promote and champion Opportunity Areas, and identify those that require public investment and intervention to achieve their growth potential</li> <li>5) Ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities</li> <li>6) Ensure that opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration</li> <li>7) Monitor progress in delivering homes, jobs and infrastructure, taking action where necessary to overcome any barriers to delivery</li> <li>8) Ensure that development facilitates ambitious transport mode share targets</li> </ol>	<p>Does not currently mention the need to ensure that the freight (goods and servicing) needs of Opportunity Areas are assessed at the planning phase (both for commercial and residential development), so that adequate freight transport infrastructure can be accommodated into the plans. This includes suitable on- and off-street loading/unloading infrastructure and innovative schemes for last-mile deliveries to residents.</p> <p>Also, should mention the points regarding freight transport impacts and Opportunity Areas that are already included in policy T7A but not reflected here.</p>
SD1B	<p>Boroughs, through Development Plans and decisions, should:</p> <ol style="list-style-type: none"> <li>1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas</li> </ol>	

	<ol style="list-style-type: none"> <li>2) Support development which creates employment opportunities and housing choices for Londoners</li> <li>3) Plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary</li> <li>4) Recognise that larger areas can define their own character and density</li> <li>5) Support an sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with 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</li> <li>6) Meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12:       <ul style="list-style-type: none"> <li>● Bakerloo Line Extension</li> <li>● Old Kent Road OA</li> <li>● New Cross/Lewisham/Catford OA</li> <li>● Crossrail 2 South           <ul style="list-style-type: none"> <li>○ Kingston OA</li> <li>○ Wimbledon OA</li> <li>○ Clapham Junction OA</li> </ul> </li> <li>● Crossrail 2 North           <ul style="list-style-type: none"> <li>○ Lee Valley OA</li> <li>○ Wood Green/Haringey Heartlands OA</li> <li>○ New Southgate OA</li> </ul> </li> <li>● Thames Estuary North and South           <ul style="list-style-type: none"> <li>○ Poplar Riverside OA</li> <li>○ Royal Docks OA</li> <li>○ Thamesmead and Abbey Wood OA</li> <li>○ Bexley Riverside OA</li> </ul> </li> <li>● High Speed 2/Thameslink</li> </ul> </li> </ol>	
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	<ul style="list-style-type: none"> <li>○ Old Oak/Park Royal</li> <li>● Elizabeth Line East</li> <li>● Heathrow/Elizabeth Line West</li> <li>● Central London <ul style="list-style-type: none"> <li>○ Euston</li> </ul> </li> <li>● Trams Triangle/London Gatwick-Brighton mainline</li> </ul> <p>7) Include ambitious transport mode share targets</p> <p>8) Support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration</p> <p>9) Ensure planning frameworks are subject to public and stakeholder consultation</p> <p>10) Work with the Mayor, local communities and other stakeholders to review appropriate locations and identify new Opportunity Areas. These should be distinct and significant locations that have capacity for at least 5,000 new jobs and/or 2,500 new homes.</p>	
<b>Policy SD2</b>	<b>Collaboration in the Wider South East</b>	
<b>SD2A</b>	The Mayor will work with partners across the Wider South East (WSE) to address appropriate regional and sub-regional challenges and opportunities through recently-developed strategic coordination arrangements	
<b>SD2B</b>	To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE partners to ensure that plan-making is, as far as possible, informed by consistent technical evidence.	
<b>SD2C</b>	The Mayor will take account of the views of WSE partners in discharging his Duties to Inform and Consult with authorities beyond London and will respond to their Duty to Co-operate requests for views on Development Plans insofar as they bear strategically on London.	
<b>SD2D</b>	The Mayor supports recognition of long-term trends in migration in the development of Local Plans outside London.	
<b>SD2E</b>	The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: barriers to housing and infrastructure delivery (including 'smart' solutions – see also paragraph 9.6.7); factors that influence economic prosperity; the need to tackle climate change (including water management and flood risk);	

	improvements to the environment (including air quality) and waste management (including the promotion of Circular Economies); wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.	
<b>Policy SD3</b>	<b>Growth locations in the Wider South East and beyond</b>	
<b>SD3A</b>	The Mayor will work with relevant WSE partners, Government and other agencies to realise the potential of the wider city region and beyond through investment in strategic infrastructure to support housing and business development in growth locations to meet need and secure mutual benefits for London and relevant partners. [Fig 2.15]	
<b>SD3B</b>	The Mayor supports recognition of these growth locations with links to London in relevant Local Plans.	
<b>Policy SD4</b>	<b>The Central Activities Zone (CAZ)</b>	
<b>SD4A</b>	The unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions as well as local uses, should be promoted and enhanced.	
<b>SD4B</b>	The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.	
<b>SD4C</b>	The distinct environment and heritage of the CAZ should be sustained and enhanced.	
<b>SD4D</b>	Taking account of the dense nature of the CAZ, practical measures should be taken to improve air quality, using an air quality positive approach where possible (Policy SI1 Improving air quality) and to address issues related to climate change and the urban heat island effect.	
<b>SD4E</b>	The unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions should be promoted and enhanced.	
<b>SD4F</b>	The vitality and viability of the international shopping and leisure destinations of the West End and Knightsbridge together with other CAZ retail clusters should be supported.	
<b>SD4G</b>	The CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.	
<b>SD4H</b>	The attractiveness of the CAZ to residents, visitors and businesses should be enhanced through public realm improvements and the reduction of traffic dominance, as part of the Healthy Streets Approach (see Policy T2 Healthy Streets).	

SD4I	Infrastructure to sustain and enhance the CAZ and its agglomeration of strategic functions including its public transport and digital connectivity and its potential to accommodate new development should be secured.	
SD4J	The safety, security and resilience of the CAZ should be promoted working with businesses and communities.	
SD4K	The attractiveness of predominantly residential neighbourhoods, where more local uses predominate, should be conserved.	
SD4L	Development of social infrastructure that meets the distinct needs of the CAZ should be supported.	
SD4M	Sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions within or close to the CAZ and Northern Isle of Dogs to support the needs of businesses and activities within these areas.	<p>Should go beyond identification and protection, to the provision of suitable logistics land for the operation of innovative, sustainable, energy-efficient last-mile delivery solutions for businesses and residents in central London. This is necessary to prevent continued, ever-greater 'logistics sprawl' over time, associated with providing goods and services to businesses and residents in the CAZ.</p> <p>Several innovative, sustainable freight transport operations require the use of small, suitably located depots especially in inner and central London. However, at present market forces mean that such land is unaffordable to logistics operators. However, the Mayor, London boroughs and other public sector organisations have considerable land portfolios that are not needed for their current business. There is therefore scope for these public sector organisations to find ways in which suitable land can be made available at affordable prices for sustainable freight transport and logistics operations. Given the stated sustainable transport aspirations of London's Mayor and its 33 boroughs this would seem to be a good opportunity to demonstrate and support integrated land-use and freight transport planning in London. However, most of these public organisations seem more concerned with income generation and maximisation (through releasing such land for uses and developments with higher financial returns than logistics). This is leading to a fundamental mismatch between the stated sustainable freight transport objectives and targets and sufficiently strong policy actions needed to support and achieve these sustainability objectives.</p>
SD4N	<p>In Development Plans, boroughs should:</p> <ol style="list-style-type: none"> <li>1) Define the detailed boundary of the CAZ and specialist clusters of strategic functions having regard to the CAZ Diagram shown in Figure 2.16</li> <li>2) Develop locally sensitive policies to meet this Plan's objectives for the CAZ</li> <li>3) Define the detailed boundaries of the CAZ satellite and reserve locations</li> </ol>	
Policy SD5	<b>Offices, other strategic functions and residential development in the CAZ</b>	

SD5A	New residential development should not compromise the strategic functions of the CAZ.	
SD5B	Residential development is not appropriate in the commercial core of the City of London and Northern Isle of Dogs (detailed boundaries to be defined by boroughs in Development Plans).	
SD5C	<p>Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas of the CAZ including:</p> <ol style="list-style-type: none"> <li>1) Other parts of the City of London and Northern Isle of Dogs (outside core areas in part B above)</li> <li>2) The West End, Knightsbridge and other core commercial areas in the City of Westminster including Soho, Covent Garden, its Opportunity Areas and commercial parts of Marylebone and Fitzrovia</li> <li>3) Commercial core areas identified in the City Fringe/Tech City Opportunity Area Planning Framework</li> <li>4) All other Opportunity Areas (except Vauxhall, Nine Elms, Battersea and Elephant &amp; Castle)</li> <li>5) Identified clusters of specialist CAZ strategic functions, CAZ retail clusters and locally identified Special Policy Areas.</li> </ol>	
SD5D	<p>Offices and other CAZ strategic functions are given equal weight relative to new residential in other part of the CAZ not covered in parts B or C above including:</p> <ol style="list-style-type: none"> <li>1) Vauxhall, Nine Elms, Battersea Opportunity Area</li> <li>2) Elephant &amp; Castle Opportunity Area</li> <li>3) Predominantly residential neighbourhoods or wholly residential streets (with exceptions in appropriate circumstances – for example clusters of specialist CAZ strategic functions, Special Policy Areas and CAZ retail clusters)</li> </ol>	
SD5E	In Development Plans, boroughs should develop local policies and define detailed boundaries for the areas in parts B, C and D above.	
SD5F	The Mayor will work with boroughs and support them to introduce Article 4 Directions to remove office to residential permitted development rights across the whole of the CAZ and the Northern Isle of Dogs (and those parts of Tech City and Kensington & Chelsea lying outside the CAZ).	
SD5G	Mixed-use office/residential proposals are supported in principle in areas defined in parts C and D above where there is an equivalent or net increase in office floorspace.	
SD5H	Residential development proposals should lead to a loss of office floorspace in any part of the CAZ unless there is no reasonable and demonstrable prospect of the	

	site being used for offices and/or alternative provision is made for the provision of net additional office space near the development (including through swaps and credits – see part I below).	
<b>SD5I</b>	Local approaches to mixed-use development of offices with housing should take into account the potential to use land use swaps, credits and off-site contributions to sustain strategically-important clusters of commercial activities such as those in the City of London, other parts of the commercial core of the CAZ and the Northern Isle of Dogs.	
<b>Policy SD6</b>	<b>Town Centres</b>	
<b>SD6A</b>	<p>London's varied town centres and their vitality and viability should be promoted and enhanced as:</p> <ol style="list-style-type: none"> <li>1) Strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development.</li> <li>2) Locations for mixed-use or housing-led intensification and higher-density renewal, securing a high quality environment and complementing local character and heritage assets</li> <li>3) The structure for delivering sustainable access by walking, cycling and public transport to a competitive range of services and activities</li> <li>4) The main focus for Londoners' sense of place and local identity in the capital</li> <li>5) The primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy</li> <li>6) A key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management</li> </ol>	
<b>SD6B</b>	The adaptation and restructuring of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.	
<b>SD6C</b>	The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages	

	where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.	
SD6D	The particular suitability of town centres for smaller households, Build to Rent, older people's housing and student accommodation should be considered and encouraged.	
SD6E	The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see Policy E1 Offices) and the need for affordable business space (Policy E3 Affordable workspace).	
SD6F	The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.	
SD6G	Tourist infrastructure, attractions and hotels in town centre locations, especially in out London, should be enhanced and promoted (see Policy E10 Visitor infrastructure).	
SD6H	The delivery of barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerb and tactile paving, seating and public toilets.	
SD6I	The provision of social infrastructure should be enhanced, and facilities should be located in places that maximise footfall to surrounding town centre uses.	
SD6J	Safety and security should be improved, and active street frontages should be secured in new development, including where there are ground floor residential frontages.	
<b>Policy SD7</b>	<b>Town centre network</b>	
SD7A	The changing roles of town centres should be proactively managed in relation to the town centre network as a whole (see Figure 2.17 and Annex 1). This process should support sustainable economic growth across the Greater London boundary to enhance the vitality and viability of London's centres and complement those in the Wider South East.	
SD7B	Identified deficiencies in the London town centre network can be addressed by promoting centre to function at a higher level in the network, designating new centres (see Annex 1) or reassessing town centre boundaries (see Policy SD8 Town centres: development principles and Development Plan Documents). Centres with	

	current or projected declining demand for commercial, particularly retail, floorspace may be reclassified at a lower level in the hierarchy.	
<b>SD7C</b>	The classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan. Potential future changes to the strategic town centre network are set out in Figure A1.1 in Annex 1. Changes to District, Local and Neighbourhood centres can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate (see Policy SD8 Town centres: development principles and Development Plan Documents).	
<b>SD7D</b>	International, Metropolitan and Major town centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high quality environment.	
<b>SD7E</b>	District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.	
<b>SD7F</b>	Local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.	
<b>SD7G</b>	Boroughs and other stakeholders should have regard to the broad policy guidelines for individual town centres in Annex 1 including: <ol style="list-style-type: none"> <li>1) Indicative growth potential (commercial and residential)</li> <li>2) Centres associated with the Areas for Regeneration (see Policy SD10 Strategic and local regeneration)</li> <li>3) Night-time economy roles (see Policy HC6 Supporting the night-time economy)</li> <li>4) Viable office locations including those with strategic office development potential and/or need to retain existing office functions in light of office to residential permitted development rights (see Policy E1 Offices)</li> </ol>	
<b>Policy SD8</b>	<b>Town centres: development principles and Development Plan Documents</b>	
<b>SD8A</b>	Development Plans and development proposals should take a town centres first approach by: <ol style="list-style-type: none"> <li>1) Adopting a sequential approach to accommodating town centre uses including retail, commercial, offices, leisure, entertainment, culture,</li> </ol>	

	<p>tourism and hotels such that new development of these uses is focused on sites within town centre or (if not sites are available, suitable of viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport</p> <ol style="list-style-type: none"> <li>2) Firmly resisting out-of-centre development or town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in out London (see Policy E1 Offices)</li> <li>3) Providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan</li> <li>4) Realising the full potential of existing out of centre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location having regard to parts A(1), (2) and (3) above.</li> </ol>	
<b>SD8B</b>	<p>In Development Plans, boroughs should:</p> <ol style="list-style-type: none"> <li>1) Define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages and night-time economy in light of demand/capacity assessments for town centre uses and housing</li> <li>2) Develop policies through strategic and local partnership approaches (Policy SD9 Town Centres: Local partnerships and implementation) to meet the objectives for town centres set out in Policy SD6 Town centres to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network (Policy SD7 Town Centre network)</li> <li>3) Develop policies for the edge and fringes of town centres, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances</li> <li>4) Identify centre that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1. Criteria</li> </ol>	

	<p>to consider in assessing the potential for intensification in town centres include:</p> <ul style="list-style-type: none"> <li>a) Assessments of demand for retail, office and other commercial uses</li> <li>b) Assessments of capacity for additional housing</li> <li>c) Public transport accessibility and capacity</li> <li>d) Planned or potential transport improvements – to indicate future capacity for intensification</li> <li>e) Existing and potential level of density of developments and activity</li> <li>f) Relationship with wider regeneration initiatives</li> <li>g) Vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre</li> <li>h) Potential to complement local character, existing heritage assets and improve the quality of the town centre environment</li> <li>i) Viability of development</li> </ul> <p>5) Identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example:</p> <ul style="list-style-type: none"> <li>a) Comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks</li> <li>b) Redevelopment of town centre shopping frontages that are surplus to demand</li> <li>c) Redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re[providing non-residential uses</li> <li>d) Delivery residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development.</li> </ul> <p>6) Support flexibility for temporary or 'meanwhile' uses of vacant properties.</p>	
SD8C	<p>Development proposals should:</p> <ul style="list-style-type: none"> <li>1) Ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment</li> <li>2) Ensure that commercial space is appropriately located having regard to Part A above, fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights</li> </ul>	

	<p>and servicing, and marketing at rental levels that are related to demand in the area or similar to surrounding existing properties</p> <ol style="list-style-type: none"> <li>3) Support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road uses, and the amenity of neighbouring residents</li> <li>4) Support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.</li> </ol>	
<b>Policy SD9</b>	<b>Town centres: Local partnerships and implementation</b>	
<b>SD9A</b>	To develop a strong, resilient and adaptable town centres, fulfilling their full potential to accommodate growth and development, strategic and local partnership approaches, community engagement, town centre management, business associations and Business Improvement Districts should be supported and encouraged. Each town centre should have a Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.	
<b>SD9B</b>	Regular town centre health checks should be undertaken to inform strategic and local policy and implementation	
<b>SD9C</b>	<p>Boroughs should:</p> <ol style="list-style-type: none"> <li>1) Introduce targeted Article 4 Directions where appropriate and justified to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability and to maintain flexibility for more comprehensive approaches to town centre housing and mixed-use intensification. When considering office to residential Article 4 Directions in town centres, boroughs are encouraged to take into account guidelines in Annex 1 and Policy E1 Offices as well as local circumstances</li> <li>2) Take a proactive and partnership-based approach to bring sites forward for redevelopment, supporting land assembly in collaboration with local stakeholders including, where appropriate, through the compulsory purchase process</li> <li>3) Consider the range of mechanisms to deliver housing intensification, mixed-use development and ongoing asset management such as town centre investment models and the contribution of specialist forms of housing investment.</li> </ol>	
<b>Policy SD10</b>	<b>Strategic and local regeneration</b>	

SD10A	<p>Boroughs should:</p> <ol style="list-style-type: none"> <li>1) Identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans based on a thorough understanding of the demographics of communities and their needs</li> <li>2) Seek to identify Local Areas for Regeneration taking into account local circumstances</li> </ol>	
SD10B	<p>Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration.</p>	
SD10C	<p>Boroughs and other stakeholders should develop locally-sensitive policies and initiatives and support development proposals that contribute to the renewal of town centres in Strategic and Local Areas for Regeneration (see Town Centres policies and Annex 1).</p>	
<b>Policy D1</b>	<p><b>London's form and characteristics</b> Development Plans, area-based strategies and development proposals should address the following:</p>	
D1A	<p>The form and layout of place should:</p> <ol style="list-style-type: none"> <li>1) Use land efficiently by optimising density, connectivity and land use patterns</li> <li>2) Facilitate an inclusive environment</li> <li>3) Be street-based with clearly defined public and private environments</li> <li>4) Deliver appropriate outlook, privacy and amenity</li> <li>5) Achieve safe and secure environments</li> <li>6) Provide active frontages and positive reciprocal relationships between what happens inside buildings and outside in the public realm to generate liveliness and interest</li> <li>7) Provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity</li> <li>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</li> <li>9) Help prevent or mitigate the impacts of noise and poor air quality</li> <li>10) Facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users</li> </ol>	<p>Point 10 mentions the importance of efficient servicing and deliveries. However, in the text paragraph 3.1.7 only refers to new developments and only discusses activity outside peak hours and means by which to reduce 'missed deliveries' without specifying any appropriate actions.</p> <p>See also responses provided in section T7 which refer to several other issues relating to land-use and freight transport (goods and service) operations in London that are of interest and importance but which don't seem to be dealt with by the Mayor's Transport Strategy or the London Plan. These focus on the freight trip generation rates and pattern of these trips at sites (commercial and residential) that receive goods and services. Policy that focused on reducing and improving the operational efficiency of these freight activities could have a major bearing on the intensity and sustainability of freight transport in London. Possibilities and ideas to overcome some of this are provided in responses in section T7.</p>
D1B	<p>Development design should:</p>	

	<ol style="list-style-type: none"> <li>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</li> <li>2) Be of high quality, with architecture that pays attention to details, and gives through 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</li> <li>3) Aim for high sustainability standards</li> <li>4) Respect, enhance and utilise the heritage assets and architectural features that make up the local character</li> <li>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</li> <li>6) Achieve comfortable and inviting environments both inside and outside buildings</li> </ol>	
<b>Policy D2</b>	<b>Delivering good design</b>	
D2A	<p><b>Initial evaluation</b></p> <p>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"> <li>1) Socio-economic data (such as Indices of Multiple Deprivation, health and well-being indicators, population density, employment data, educational qualifications, crime statistics)</li> <li>2) Housing type and tenure</li> <li>3) Urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)</li> <li>4) Transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned)</li> <li>5) Air quality and noise levels</li> <li>6) Open space networks, green infrastructure, and water bodies</li> <li>7) Historical evolution and heritage assets (including an assessment of their significance and contribution to local character)</li> <li>8) Topography and hydrology</li> <li>9) Land availability</li> </ol>	

	<p>10) Existing and emerging development plan designations</p> <p>11) Existing and future uses and demand for new development, including housing requirements and social infrastructure</p>	
D2B	<p><b>Determining capacity for growth</b></p> <p>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>	
D2C	<p><b>Design analysis and visualisation</b></p> <p>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>	
D2D	<p><b>Design quality and visualisation</b></p> <p>Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the characteristic set out in Policy D1 London's form and characteristics.</p>	
D2E	<p><b>Design scrutiny</b></p> <p>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>	
D2F	<p>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"> <li>1) Are above the applicable density indicated in Part C of Policy D6 Optimising housing density; or</li> <li>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</li> </ol>	
D2G	<p>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"> <li>1) Design reviews are carried out transparently by independent experts in relevant disciplines</li> <li>2) Design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme</li> <li>3) Where a scheme is reviewed more than once, subsequent design reviews reference and build on recommendations of previous design reviews</li> <li>4) Design review recommendations are appropriately recorded and communicated to officers and decisions makers</li> <li>5) Schemes show how they have considered and addressed the design review recommendations</li> <li>6) Planning decisions demonstrate how design review been addressed [sic]</li> </ol>	
<b>D2H</b>	<p><b>Maintaining design quality</b></p> <p>The design quality of development should be retained through to completion by:</p> <ol style="list-style-type: none"> <li>1) Having 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</li> <li>2) Ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design</li> <li>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</li> <li>4) Local planning authorities using architect retention clauses in legal agreements where appropriate</li> </ol>	
<b>Policy D3</b>	<b>Inclusive design</b>	
<b>D3A</b>	<p>To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:</p> <ol style="list-style-type: none"> <li>1) Can be entered and used safely, easily and with dignity by all</li> <li>2) Are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment</li> <li>3) Are designed to incorporate safe and dignified emergency evacuation for all building users. In developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should</li> </ol>	

	be a fire evacuation lift suitable to be used to evacuate people required level access from the building.	
D3B	The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement.	
<b>Policy D4</b>	<b>Housing quality and standards</b>	
D4A	To optimise the development of housing on sites across London a range of housing typologies will need to be built. To bring forward development on constrained sites, innovative housing designs that meet the requirements of 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.	
D4B	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.	
D4C	Qualitative aspects of a development are key to ensuring successful sustainable housing and should be fully considered in the design of any housing developments.	
D4D	<p>Housing developments are required to meet the minimum standards below. These standards apply to all tenures and all residential accommodation that is self-contained.</p> <p><b>Private internal space</b></p> <ol style="list-style-type: none"> <li>1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.</li> <li>2) A dwelling with two or more bedspaces must have a 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.</li> <li>3) A one bedspace single bedroom must have a floor area of at least 7.5sqm and be at least 2.15m wide.</li> <li>4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sqm.</li> <li>5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sqm within the Gross Internal Area).</li> </ol>	

	<p>6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.</p> <p>7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sqm in a double bedroom and 0.35sqm in a single bedroom counts towards the built-in storage requirement.</p> <p>8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.</p> <p><b>Private outside space</b></p> <p>9) A minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm 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>10) The minimum depth and width for all balconies and other private external spaces should be 1.5m.</p>	
D4E	Residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 London's form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.	
D4F	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.	
D4G	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.	
The Mayor will produce guidance on the implementation of this policy for all housing tenures.		
<b>Policy D5</b>	<b>Accessible housing</b>	
D5A	To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that: <p>1) At least 10 per cent of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. designed to be</p>	

	<p>wheelchair accessible, or easily adaptable for residents who are wheelchair users</p> <p>2) All other new build dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'</p>	
<b>Policy D6</b>	<b>Optimising housing density</b>	
<b>D6A</b>	<p>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"> <li>1) The site context</li> <li>2) Its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)</li> <li>3) The capacity of surrounding infrastructure</li> </ol> <p>Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.</p>	
<b>D6B</b>	<p>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"> <li>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</li> <li>2) The ability to support proposed densities through encouraging active travel should be taken into account</li> <li>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.</li> </ol>	
<b>D6C</b>	<p>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 Policy D4 Housing quality and standards, 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</p>	

	<p>requirements set out in part F of Policy D2 Delivering good design and submit a management plan if the proposed density is above:</p> <ol style="list-style-type: none"> <li>1) 110 units per hectare in areas of PTAL 0 to 1; or</li> <li>2) 240 units per hectare in areas of PTAL 2 to 3; or</li> <li>3) 405 units per hectare in areas of PTAL 4 to 6.</li> </ol>	
<b>D6D</b>	<p>The following measures of density should be provided for all planning applications that include new residential units:</p> <ol style="list-style-type: none"> <li>1) Number of units per hectare</li> <li>2) Number of habitable rooms per hectare</li> <li>3) Number of bedrooms per hectare</li> <li>4) Number of bedspaces per hectare</li> </ol>	
<b>D6E</b>	<p>The following additional measures should be provided for all major planning applications:</p> <ol style="list-style-type: none"> <li>1) The Floor Area Ratio (total Gross External Area of all floors/site area)</li> <li>2) The Site Coverage Ratio (Gross External Area of ground floors/site area)</li> <li>3) The maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).</li> </ol> <p>These built form and massing measures should be considered in relations to the surrounding context to help inform the optimum density of a development.</p>	
<b>Policy D7</b>	<p><b>Public realm</b> Development Plans and development proposals should:</p>	
<b>D7A</b>	<p>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 incorporated the highest quality design, landscaping, planting, street furniture and surfaces.</p>	
<b>D7B</b>	<p>Maximise the contribution that the public realm make 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 that reduces the impact of traffic noise and encourages appropriate vehicle speeds.</p>	
<b>D7C</b>	<p>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>	
<b>D7D</b>	<p>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</p>	

	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.	
D7E	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.	
D7F	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.	
D7G	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.	
D7H	Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.	
D7I	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 of 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.	
D7J	Explore opportunities for innovative approaches to improving the public realm such as open street events.	
D7K	Create an engaging public realm for people of all ages, with opportunities for formal and informal place 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.	
D7L	Ensure that on-street parking is designed so that it is not dominant of 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.	
D7M	Ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm.	
<b>Policy D8</b>	<b>Tall Buildings</b>	

	Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:	
<b>D8A</b>	<b>Definition</b> Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London	
<b>D8B</b>	<b>Tall building locations</b> Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of: <ul style="list-style-type: none"> <li>1) The visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below)</li> <li>2) Their potential contribution to new homes, economic growth and regeneration</li> <li>3) The public transport connectivity of different locations</li> </ul>	
<b>D8C</b>	<b>Impacts</b> The impact of a tall building can be visual, functional or environmental. All three elements should be considered within plan-making and in deciding development proposals: <ul style="list-style-type: none"> <li>1) Visual impacts <ul style="list-style-type: none"> <li>a) The views of buildings from different distances need to be considered, including: <ul style="list-style-type: none"> <li>i. Long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views</li> <li>ii. Mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.</li> <li>iii. Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent</li> </ul> </li> </ul> </li> </ul>	

	<p>to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.</p> <ul style="list-style-type: none"> <li>b) Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding</li> <li>c) Architectural quality and materials should be of an exemplary standard to ensure the appearance and architectural integrity of the building is maintained through its lifespan</li> <li>d) Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposal resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area</li> <li>e) Buildings near in the setting of a World Heritage Site must preserve the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it</li> <li>f) Buildings near the River Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river</li> <li>g) Buildings should not cause adverse reflected glare.</li> </ul> <p>2) Functional impact</p> <ul style="list-style-type: none"> <li>a) The internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.</li> <li>b) Buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process</li> <li>c) Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure</li> </ul>	
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	<p>there is no unacceptable overcrowding or isolation in the surrounding areas</p> <ul style="list-style-type: none"> <li>d) It must be demonstrated that the capacity of the area and its transport networks is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building</li> <li>e) Infrastructure improvements required as a result of the development should be delivered and phased appropriately</li> <li>f) Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the role of the development as a catalyst for further change in the area</li> <li>g) Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.</li> </ul> <p>3) Environmental impact</p> <ul style="list-style-type: none"> <li>a) Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building</li> <li>b) Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions</li> <li>c) Noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.</li> </ul> <p>4) Cumulative impacts</p> <ul style="list-style-type: none"> <li>a) The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.</li> </ul>	
D8D	<b>Public access</b>	

	Publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.	
<b>Policy D9</b>	<b>Basement development</b>	
<b>D9A</b>	Boroughs, particularly in inner London, should establish policies to address the negative impacts of large-scale basement development beneath existing buildings.	
<b>Policy D10</b>	<b>Safety, security and resilience to emergency</b> The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.	
<b>D10A</b>	Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment.	
<b>D10B</b>	Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.	
<b>Policy D11</b>	<b>Fire safety</b>	
<b>D11A</b>	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 sure that they: <ol style="list-style-type: none"> <li>1) Are designed to incorporate appropriate features which reduce the risk to life in the event of a fire</li> <li>2) Are constructed in an appropriate way to minimise the risk of fire spread</li> <li>3) Provide suitable and convenient means of escape for all building users</li> <li>4) Adopt a robust strategy for evacuation which all building users can have confidence in</li> <li>5) Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.</li> </ol>	
<b>D11B</b>	All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produce by a third party suitably qualified assessor.	

	<p>The statement should detail how the development proposal will function in terms of:</p> <ol style="list-style-type: none"> <li>1) The building's construction: methods, products and materials used</li> <li>2) The means of escape for all building users: stair cores, escape for building users who are disabled or required level access, and the associated management plan approach</li> <li>3) Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positions of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these</li> <li>4) How provision will be made within the site to enable fire appliances to gain access to the building</li> </ol>	
<b>Policy D12</b>	<b>Agent of Change</b>	
<b>D12A</b>	The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development.	
<b>D12B</b>	Boroughs should ensure that planning decisions reflect the Agent of Change principle and take account of existing noise-generating uses in a sensitive manner when new development, particularly residential, is proposed nearby.	
<b>D12C</b>	<p>Development proposals should manage noise and other potential nuisances by:</p> <ol style="list-style-type: none"> <li>1) Ensuring good acoustic design to mitigate and minimise existing and potential impacts of noise generated by existing uses located in the area</li> <li>2) Exploring mitigations measures early in the design stage, with necessary and appropriate provisions secured through planning obligations</li> <li>3) Separating new noise-sensitive development where possible from existing noise-generating businesses through distance, screening, internal layout, sound-proofing and insulation, and other acoustic design measures.</li> </ol>	
<b>D12D</b>	Development should be designed to ensure that established noise-generating venues remain viable and can continue or grow without unreasonable restrictions being placed on them.	
<b>D12E</b>	New noise-generating development, such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues proposed close to residential and other noise-sensitive development should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses.	

D12F	Boroughs should refuse development proposals that have not clearly demonstrated how noise impacts will be mitigated and managed.	
<b>Policy D13</b>	<b>Noise</b>	
D13A	<p>In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:</p> <ol style="list-style-type: none"> <li>1) Avoiding significant adverse noise impacts on health and quality of life</li> <li>2) Reflecting the Agent of Change principle to ensure measurers do not add unduly to the costs and administrative burdens on existing noise-generating uses</li> <li>3) Mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development</li> <li>4) Improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)</li> <li>5) Separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation</li> <li>6) Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigate through applying good acoustic design principles</li> <li>7) Promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.</li> </ol>	
D13B	Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.	
<b>Policy H1</b>	<b>Increasing housing supply</b>	
H1A	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.	
H1B	<p>To ensure that ten-year housing targets are achieved:</p> <ol style="list-style-type: none"> <li>1) Boroughs should prepare delivery-focused Development Plans which:</li> </ol>	

	<ul style="list-style-type: none"> <li>a) Allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification</li> <li>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</li> <li>c) Enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA</li> </ul> <p>2) Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <ul style="list-style-type: none"> <li>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</li> <li>b) Mixed-use redevelopment of car parks and low-density retail parks</li> <li>c) Housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses</li> <li>d) The redevelopment of surplus utilities and public sector owned sites</li> <li>e) Small housing sites (see Policy H2 Small sites)</li> <li>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.</li> </ul>	
<b>H1C</b>	Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.	
<b>H1D</b>	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.	
<b>H1E</b>	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.	
H1F	On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These development 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.	
<b>Policy H2</b>	<b>Small sites</b>	
H2A	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: <ol style="list-style-type: none"> <li>1) Significantly increase the contribution of small sites to meeting London's housing needs</li> <li>2) Diversify the sources, locations, type and mix of housing supply</li> <li>3) Support small and medium-sized housebuilders</li> <li>4) Support those wishing to bring forward custom, self-build and community-led housing.</li> </ol>	
H2B	Boroughs should: <ol style="list-style-type: none"> <li>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</li> <li>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.</li> </ol>	
H2C	Boroughs should increase planning certainty on small sites by: <ol style="list-style-type: none"> <li>1) Identifying and allocation appropriate small sites for residential development</li> <li>2) Listing these sites on their brownfield registers</li> <li>3) Granting planning permission in principle on specific sites or preparing local development orders.</li> </ol>	
H2D	To deliver the small sites targets in Table 4.2, borough should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:	

	<ol style="list-style-type: none"> <li>1) Infill development on vacant or underused sites</li> <li>2) Proposals to increase the density of existing residential homes within PRALs 3-6 or within 800m of a Tube station, rail station or town centre boundary through: <ol style="list-style-type: none"> <li>a) Residential conversions</li> <li>b) Residential extensions</li> <li>c) The demolition and redevelopment of existing buildings</li> <li>d) Infill development within the curtilage of a house</li> </ol> </li> <li>3) The redevelopment or upward extension of flats and non-residential buildings to provide additional housing.</li> </ol>	
H2E	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.	
H2F	<p>The presumption in favour of small housing developments should not be applied to:</p> <ol style="list-style-type: none"> <li>1) Statutory listed buildings</li> <li>2) Developments providing more than 25 homes</li> <li>3) Proposals that do not provide net additional housing</li> <li>4) Sites of more than 0.25 hectares in size</li> <li>5) Non-self-contained housing scheme</li> <li>6) Mixed-use proposals within the Central Activities Zone (CAZ)</li> <li>7) Estate regeneration schemes.</li> </ol>	
H2G	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.	
H2H	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 prior to commencement of development.	
<b>Policy H3</b>	<b>Monitoring housing targets</b>	
H3A	The ten-year housing targets set out in Table 4.1 should be monitored in net terms taking into account homes lost through demolition or change of use.	
H3B	Net housing delivery on sites of less than 0.25 hectares should contribute towards achieving the small sites targets in Table 4.2.	
H3C	Net non-self-contained accommodation for students and shared living schemes should count towards meeting housing targets on the basis of a 3:1 ratio, with three bedrooms being counted as a single home.	
H3D	Net non-self-contained accommodation for older people (C2 use class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home.	
<b>Policy H4</b>	<b>Meanwhile use</b> Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development	
<b>Policy H5</b>	<b>Delivering affordable housing</b>	
H5A	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: <ol style="list-style-type: none"> <li>1) Requiring residential and mixed-use developments to provide affordable housing through the threshold approach (Policy H6 Threshold approach to applications)</li> <li>2) Using grant to increase affordable housing delivery beyond the level that would otherwise be provided</li> <li>3) affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio</li> <li>4) Public sector land delivering at least 50 per cent affordable housing across its portfolio</li> <li>5) Strategic partners with agreements with the Mayor aiming to at least 60 per cent affordable housing across their portfolio.</li> </ol>	
H5B	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.	
<b>Policy H6</b>	<b>Threshold approach to applications</b>	

H6A	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).	
H6B	<p>The threshold level of affordable housing is initially set at:</p> <ol style="list-style-type: none"> <li>1) A minimum of 35 per cent</li> <li>2) 50 per cent for public sector land</li> <li>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).</li> </ol> <p>The 35 per cent threshold will be review in 2021 and if appropriate increased through Supplementary Planning Guidance.</p>	
H6C	<p>To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:</p> <ol style="list-style-type: none"> <li>1) Meet or exceed the relevant threshold level of affordable housing on site without public subsidy</li> <li>2) Be consistent with the relevant tenure split (Policy H7 Affordable housing tenure)</li> <li>3) Meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant</li> <li>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.</li> </ol>	
H6D	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 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).	
H6E	<p>Where an application does not meet the requirements set out in part C it must follow the <b>Viability Tested Route</b>. 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"> <li>1) The borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing</li> </ol>	

	<p>using the methodology and assumptions set out in the Plan and the Affordable Housing and Viability SPG</p> <p>2) Viability tested schemes will be subject to:</p> <ol style="list-style-type: none"> <li>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)</li> <li>b) A Late 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)</li> <li>c) Mid Term Reviews prior to implementation of phases for larger phased schemes.</li> </ol>	
H6F	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.	
	<b>Scheme amendments – Section 73 applications and deeds of variations</b>	
H6G	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.	
H6H	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 Test Route.	
H6I	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 values, costs, profit requirements and land value of the scheme.	
H6J	The Mayor should be consulted on any proposed amendments on referable schemes that change the level of affordable housing from that which was secured the original planning permission.	
<b>Policy H7</b>	<b>Affordable housing tenure</b>	
H7A	The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:	

	<ol style="list-style-type: none"> <li>1) A minimum of 30 per cent low cost rented homes, allocated according to and for Londoners on low incomes (Social Rent/London Affordable Rent)</li> <li>2) A minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership</li> <li>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</li> </ol> <p>These minimums will be reviewed in 2021, and if necessary, updated through Supplementary Planning Guidance.</p>	
H7B	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.	
<b>Policy H8</b>	<b>Monitoring of affordable housing</b>	
H8A	Boroughs are required to have clear monitoring processes to ensure that the affordable housing secured on or off site is delivered in line with the Section 106 agreement.	
H8B	Monitoring processes should ensure that any cash in lieu payments are used to deliver additional affordable housing.	
H8C	Boroughs should ensure that where a review mechanism is triggered, it is implemented and the number of extra homes delivered, or cash in lieu secured is recorded.	
H8D	Boroughs must publish monitoring information on A-C annually to ensure transparency in the planning process and so the public know how funds are being spent. This information should be shared with the GLA so it can be part of the annual monitoring process.	
<b>Policy H9</b>	<b>Vacant building credit</b>	
H9A	The Vacant Building Credit is unlikely to bring forward additional development in London, therefore in most circumstances, its application will not be appropriate in London. However, there may be some limited circumstances where the credit would, in line with the intention of the credit, provide an incentive for development on sites containing vacant buildings that would not otherwise come forward for development. As part of assessing whether this is the case, decision-makers are advised to take account of the criteria below as well as locally-specific factors influencing the site.	

H9B	<p>In the limited circumstances where a borough feels the credit should be applied, boroughs are advised to consider applying the credit only where all of the following criteria are met:</p> <ol style="list-style-type: none"> <li>1) The building is not in use at the time the application is submitted</li> <li>2) The building is not covered by an extant or recently expired permissions</li> <li>3) The site is not protected for alternative land use</li> <li>4) The building has not been made vacant for the sole purpose of redevelopment</li> </ol>	
H9C	<p>To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an application will be required to demonstrate that it has been vacant for a continuous period of at least five years before the application was submitted and will also be required to provide evidence that the site has been actively marketed for at least two of those five years at realistic prices.</p>	
<b>Policy H10 Redevelopment of existing housing and estate regeneration</b>		
H10A	<p>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>	
H10B	<p>Where of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least and 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>	
H10C	<p>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 the Viability Tested Route (see Policy H6 Threshold approach to applications).</p>	
<b>Policy H11 Ensuring the best use of stock</b>		
H11A	<p>Boroughs should promote the efficient use of existing stock by using all the tools available to reduce the number of vacant dwellings.</p>	
H11B	<p>The Mayor will support boroughs with identified issues of homes being left empty as 'buy to leave' properties to put in place mechanisms which seek to ensure stock is occupied.</p>	

H11C	Boroughs should take account of the impact of the housing stock of applications for homes to be used as holiday rentals for more than 90 days a year.	
<b>Policy H12</b>	<b>Housing size mix</b>	
H12A	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: <ol style="list-style-type: none"> <li>1) The range of housing need and demand identified by the London Strategic Housing Market Assessment and, where relevant, local assessments.</li> <li>2) The requirement to deliver mixed and inclusive neighbourhoods</li> <li>3) The need to deliver a range of unit types at different price points across London</li> <li>4) The mix of uses in the scheme</li> <li>5) The range of tenures in the scheme</li> <li>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</li> <li>7) The aim to optimise housing potential on sites</li> <li>8) The ability of new development to reduce pressure on conversion and sub-division of existing stock</li> <li>9) The role of one and two bed units in freeing up family housing</li> <li>10) The potential for custom-build and community-led housing schemes.</li> </ol>	
H12B	Generally, schemes consisting mainly of one-person units and/or one-bedroom units should be resisted.	
H12C	Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.	
H12D	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 accounts of: <ol style="list-style-type: none"> <li>1) The criteria set in part A</li> <li>2) The local and strategic need for affordable family accommodation</li> <li>3) Local issues of overcrowding</li> <li>4) The impact of welfare reform</li> <li>5) The cost of delivering larger units and the availability of grant.</li> </ol>	
<b>Policy H13</b>	<b>Build to Rent</b>	
H13A	To recognise that the Build to Rent development model differs from a traditional for sale scheme and the potential role it can play in accelerating delivery, where a development meets the criteria set out below, the affordable housing offer can be	

	solely Discounted Market Rent at a genuinely affordable rent, preferably London Living Rent level. Affordable housing should be secured in perpetuity.	
<b>H13B</b>	<p>To qualify as a Build to Rent scheme within the context of this policy, all the following criteria must be met:</p> <ol style="list-style-type: none"> <li>1) The development, or block or phase within the development has at least 50 units</li> <li>2) The homes are held as Build to Rent under a covenant for at least 15 years</li> <li>3) A clawback mechanism is in place to recoup additional affordable housing contributions in the event of the covenant being broken</li> <li>4) All the units are self-contained and let separately</li> <li>5) There is unified ownership and unified management of the development</li> <li>6) Longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months</li> <li>7) The scheme offers rent certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula linked</li> <li>8) There is on-site management, this does not necessarily mean full-time dedicated on-site staff, but all schemes need to have systems for prompt resolution of issues and some daily on-site presence</li> <li>9) Providers have a complaints procedure in place and are a member of a recognised ombudsman scheme</li> <li>10) Providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.</li> </ol>	
<b>H13C</b>	For build to Rent schemes to follow the Fast Track Route they must deliver at least 35 per cent affordable housing, of which at least 30 per cent should be at London Living Rent Level, with the remainder being at a range of discounts below market rent to be agreed with the borough and/or the Mayor where relevant. Schemes must also meet all other requirements of part C of Policy H6 Threshold approach to applications. This threshold and affordable housing tenure split, will be reviewed and if necessary updated in 2021, through Supplementary Planning Guidance.	
<b>H13D</b>	Where the requirements of C above are not met, schemes must follow the Viability Tested Route set out in Policy H6. Viability assessments on such schemes should take account of the differences between Build to Rent and Build for Sale development and be undertaken in line with the Affordable Housing and Viability SPG.	

H13E	On schemes that propose a proportion of homes as Build to Rent and a proportion for sale to the market, part A of this policy will only be suitable for the Build to Rent element. The scheme should be assess as a whole, with affordable housing calculated as a proportion of total habitable rooms across the scheme.	
<b>Policy H14 Supported an specialised accommodation</b>		
H14A	<p>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"> <li>1) Move-on accommodation for people leaving hostels, refuges and other supported housing, to enable them to live independently</li> <li>2) Accommodation for young people</li> <li>3) Re-ablement accommodation (intensive short-term) for people who are ready to be discharged from hospital for who required additional support to be able to return safely to live independently at home, or to move into appropriate long-term accommodation</li> <li>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</li> <li>5) Accommodation (short-term or long-term) for people with mental health issues who require intensive support</li> <li>6) Accommodation for rough sleepers</li> <li>7) Accommodation for victims of domestic abuse</li> <li>8) Accommodation for victims of violence against women and girls</li> </ol>	
<b>Policy H15 Specialist older persons housing</b>		
H15A	<p>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"> <li>1) Local and strategic housing needs information and the indicative benchmarks set out in Table 4.4</li> <li>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</li> <li>3) The increasing need for accommodation suitable for people with dementia</li> </ol>	
H15B	Specialist older persons housing (Use Class C3) provision should deliver:	

	<ol style="list-style-type: none"> <li>1) Affordable housing in accordance with Policy H5 Delivering affordable housing, and Policy H6 Threshold approach to applications</li> <li>2) Accessible housing in accordance with Policy D5 Accessible housing</li> <li>3) The highest standards of accessible and inclusive design in accordance with Policy D3 Inclusive design</li> <li>4) Suitable levels of safe storage and charging facilities for residents' mobility scooters</li> <li>5) Pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances.</li> </ol>	
H15C	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.	
<b>Policy H16</b>	<b>Gypsy and Traveller accommodation</b>	
H16A	Boroughs should plan to meet the identified need for permanent Gypsy and Traveller pitches.	
H16B	<p>As of the start of the Plan period, boroughs should use the following definition of 'Gypsies and Travellers' as a basis for assessing need: People with a cultural tradition of nomadism, or living in a caravan, whatever their race or origin, including:</p> <ol style="list-style-type: none"> <li>1) Those who are currently travelling or living in a caravan</li> <li>2) Those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation</li> <li>3) Those who, on grounds of their own or their family's or dependants' education or health needs or old age, have ceased to travel temporarily or permanently.</li> </ol>	
H16C	<p>Boroughs that have not undertaken a needs assessment since 2008 should either:</p> <ol style="list-style-type: none"> <li>1) Undertake a Gypsy and Traveller accommodation needs assessment within the first two years of this Plan period (based on the definition set out above); or</li> <li>2) Use the midpoint figure of need in Table 3 of GLA Gypsy and Traveller Accommodation Topic Paper 2017 as identified need for pitches (over the next 10 years) until a needs assessment is undertaken as part of their Development Plan review process.</li> </ol>	

H16D	Boroughs that have undertaken a needs assessment since 2008 should update this (based on the definition set out above) as part of their Development Plan review process.	
H16E	Boroughs should undertake an audit of existing pitches and sites, identifying: <ol style="list-style-type: none"> <li>1) Areas of overcrowding</li> <li>2) Areas of potential extra capacity within existing sites</li> <li>3) Pitches in need of refurbishment.</li> </ol> Boroughs should plan to address issues identified in the audits.	
H16F	Boroughs should actively plan to protect existing Gypsy and Traveller accommodation capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.	
<b>Policy H17</b>	<b>Purpose-built student accommodation</b>	
H17A	Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that: <ol style="list-style-type: none"> <li>1) At the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood</li> <li>2) The use of the accommodation is secured for students</li> <li>3) The accommodation is secured for occupation by member of one or more specified higher education institutions</li> <li>4) At least 35 per cent of the accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance</li> <li>5) The accommodation provides adequate functional living space and layout</li> </ol>	
H17B	Boroughs, student accommodation providers and higher education institutions are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, but away from existing concentrations in central London as part of mixed-use regeneration and redevelopment schemes.	
<b>Policy H18</b>	<b>Large-scale purpose-built shared living</b>	
H18A	Large-scale purpose-built shared living Sui Generis use developments, where good quality and design, may have a role in meeting housing need in London if, at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood, and it meets all the following criteria: <ol style="list-style-type: none"> <li>1) It meets an identified need</li> </ol>	

	<ol style="list-style-type: none"> <li>2) It is located in an area well-connected to local services and employment b walking, cycling and public transport, and its design does not contribute to care dependency</li> <li>3) It is under single management</li> <li>4) Its units are all for rent with minimum tenancy lengths of no less than three months</li> <li>5) Communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include at least: <ol style="list-style-type: none"> <li>a) Convenient access to a communal kitchen</li> <li>b) Outside communal amenity space (roof terrace and/or garden)</li> <li>c) Internal communal amenity space (dining rooms, lounges)</li> <li>d) Laundry and drying facilities</li> <li>e) A concierge</li> <li>f) Community management</li> <li>g) Bedding and linen changing and/or room cleaning services.</li> </ol> </li> <li>6) The private units provide adequate functional living space and layout, and are demonstrably not C3 Use Class accommodation</li> <li>7) A management plan is provided with the application</li> <li>8) It delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 offsite affordable housing as either an: <ol style="list-style-type: none"> <li>a) Upfront cash in lieu payment to the local authority, or</li> <li>b) In perpetuity annual payment to the local authority</li> </ol> </li> </ol> <p>In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the residential units to be provided at a discount of 50 per cent of the market rent. If a lower contribution is proposed the scheme will be subject to the Viability Tested Route set out in part E of Policy H6 Threshold approach to applications.</p>	
<b>Policy S1</b>	<b>Developing London's social infrastructure</b>	
<b>S1A</b>	Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities.	
<b>S1B</b>	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.	

S1C	Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.	
S1D	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.	
S1E	New facilities should be easily accessible by public transport, cycling and walking.	
S1F	<p>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"> <li>1) There are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or;</li> <li>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 to sustain and improve services.</li> </ol>	
S1G	Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.	
<b>Policy S2</b>	<b>Health and social care facilities</b>	
S2A	<p>Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:</p> <ol style="list-style-type: none"> <li>1) Identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies</li> <li>2) Understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes</li> <li>3) Regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues</li> <li>4) Identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision</li> <li>5) Identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.</li> </ol>	

S2B	Development proposal that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.	
S2C	New facilities should be easily accessible by public transport, cycling and walking.	
<b>Policy S3</b>	<b>Education and childcare facilities</b>	
S3A	<p>To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:</p> <ol style="list-style-type: none"> <li>1) Identify and address local needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues</li> <li>2) Identify sites for future provision</li> <li>3) Ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need</li> </ol>	
S3B	<p>Development proposals for education and childcare facilities should:</p> <ol style="list-style-type: none"> <li>1) Locate facilities in areas of identified need</li> <li>2) Locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling</li> <li>3) Locate entrances and playgrounds away from busy roads, with traffic calming at entrances</li> <li>4) Link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling</li> <li>5) Maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures</li> <li>6) Encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities</li> <li>7) Ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach</li> <li>8) Ensure that facilities incorporate suitable, accessible outdoor space</li> <li>9) Locate facilities next to parks or green spaces, where possible</li> <li>10) Ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing for future demand.</li> </ol>	
<b>Policy S4</b>	<b>Play and informal recreation</b>	
S4A	<p>Boroughs should:</p> <ol style="list-style-type: none"> <li>1) Undertake audits of existing play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision</li> </ol>	

	2) Produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs	
S4B	<p>Development proposals for schemes that are likely to be used by children and young people should:</p> <ol style="list-style-type: none"> <li>1) Increase opportunities for play and informal recreation and enable children and young people to be independently mobile</li> <li>2) For residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 sqm per child that: <ol style="list-style-type: none"> <li>a) Provides a stimulating environment</li> <li>b) Can be accessed safely from the street by children and young people independently</li> <li>c) Forms an integral part of the surrounding neighbourhood</li> <li>d) Incorporates trees and/or other forms of greenery</li> </ol> </li> <li>3) Incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently</li> <li>4) For large-scale public realm developments, incorporate incidental play space to make the space more playable</li> <li>5) Not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.</li> </ol>	
<b>Policy S5</b>	<b>Sports and recreation facilities</b>	
S5A	<p>In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:</p> <ol style="list-style-type: none"> <li>1) Regularly assess the need for sports and recreation facilities</li> <li>2) Secure sites for a range of sports and recreation facilities</li> <li>3) Maintain and promote the Walk London Network shown in Figure 5.1 and encourage networks for walking, cycling and other activities</li> </ol>	
S5B	<p>Development proposals for sports and recreation facilities should:</p> <ol style="list-style-type: none"> <li>1) Increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling</li> <li>2) Maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities</li> <li>3) Support the provision of sports lighting within reasonable hours where there is an identified need for sports facilities and lighting is required to</li> </ol>	

	<p>increase their potential usage, unless the lighting gives rise to demonstrable harm to the community or biodiversity</p> <p>4) Ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.</p>	
S5C	Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G3 Metropolitan Open Land) and the borough's own assessment of the needs and opportunities for sports facilities, and the potential impact that the development will have.	
<b>Policy S6</b>	<b>Public toilets</b>	
S6A	Development proposals that include large-scale commercial developments that are open to the public, such as shops, leisure facilities and large areas of public realm, should provide and secure the future of management of free publicly-accessible toilets. These should be available during opening hours, or 24 hours a day in areas of public realm, and should be suitable for a range of users including disabled people and families with young children.	
S6B	Larger developments where users are expected to spend long periods of time or where there is no other local provision, should also provide 'Changing Places' toilets as identified in the British Standard BS8300.	
<b>Policy S7</b>	<b>Burial space</b>	
S7A	Cemeteries should be protected and the re-use of burial space supported.	
S7B	When preparing Development Plans, boroughs should ensure provision is made for the different burial needs and requirements of London's communities, including those groups for whom burial is the only option. Cross-borough and/or sub-regional working is encouraged where appropriate to identify and address the requirements of these groups and to tackle burial space shortages within the sub-region	
S7C	Development proposals for new cemetery provision should be supported. This may include provision in one borough to assist faith groups from another borough facing burial space shortages.	
<b>Policy E1</b>	<b>Offices</b>	
E1A	Improvements to the competitiveness and quality of office space of different sizes (for micro, small, medium sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.	
E1B	Increases in the current stock of offices should be supported, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 20141 in Table 6.1	

E1C	<p>The unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, NIOD (Northern Isle of Dogs) (see Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ) and other nationally-significant office locations (such as Tech City, Kensington &amp; Chelsea and the Royal Docks Enterprise Zones), should be developed and promoted. These should be supported by improvements to walking, cycling and public transport connectivity and capacity. Future potential reserve locations for CAZ-type office functions are identified at Stratford and Old Oak Common, capitalising on their current and potential public transport connectivity to central London, the UK and beyond.</p>	
E1D	<p>The diverse office markets in outer and inner London (outside the CAZ and NIOD) should be consolidated and – where viable – extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity including:</p> <ol style="list-style-type: none"> <li>1) The strategic outer London office location at Croydon town centre</li> <li>2) Other town centre office locations (see Town Centre Network office guidelines in Figure A1.4)</li> <li>3) Existing urban business parks (such as Chiswick Park, Stockley Park and Bedford Lakes), taking steps towards greater transport sustainability of these locations</li> <li>4) Locally-oriented, town centre office provision to meet local needs.</li> </ol>	
E1E	<p>Existing viable office floorspace capacity in outer and inner London locations outside the CAZ and NIOD should be retained, supported by borough Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses (see 'Policy SD9 Town centres: Local partnerships and implementation' and office guidelines in Figure A1.4)</p>	
E1F	<p>Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ, NIOD, Tech City, the Royal Docks Enterprise Zones, Kensington &amp; Chelsea and geographically-defined parts of other existing and viable strategic and local office clusters (such as those in and around the CAZ, in town centres and other viable business locations – part D.3 above) are not undermined by office to residential permitted development rights.</p>	
E1G	<p>Development proposals should:</p> <ol style="list-style-type: none"> <li>1) Take into account the need for lower cost and affordable workspace (see 'Policy E2 Low-cost business space' and 'Policy E3 Affordable workspace')</li> </ol>	

	<ol style="list-style-type: none"> <li>2) Examine the scope for the re-use of otherwise surplus large office spaces for smaller units</li> <li>3) Support the redevelopment, intensification and change of use of surplus office space to other uses including housing.</li> </ol>	
<b>Policy E2</b>	<b>Low-cost business space</b>	
<b>E2A</b>	The provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.	
<b>E2B</b>	<p>Development proposals that involve the loss of existing B1 space (including creative and artist studio space) in areas where this is an identified shortage of lower-cost space should:</p> <ol style="list-style-type: none"> <li>1) Demonstrate that there is no reasonable prospect of the site being used for business purposes, or</li> <li>2) Ensure that an equivalent amount of B1 space is e-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or</li> <li>3) Demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected. That they are subject to relocation support arrangements before the commencement of new development.</li> </ol>	
<b>E2C</b>	Development proposals for new B1 business floorspace greater than 2,500 sqm (gross external space) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.	
<b>Policy E3</b>	<b>Affordable workspace</b>	
<b>E3A</b>	<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"> <li>1) Dedicated for special sectors that have social value such as charities or social enterprises</li> <li>2) Dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces</li> <li>3) Dedicated for disadvantaged groups starting up in any sector</li> <li>4) Providing educational outcomes through connections to schools, colleges or higher education</li> <li>5) Supporting start-up businesses or regeneration.</li> </ol>	

E3B	<p>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"> <li>1) Where there is existing affordable workspace on-site</li> <li>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 CAX and in Creative Enterprise Zones)</li> <li>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.</li> </ol>	
E3C	<p>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>	
E3D	<p>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 effectively.</p>	
E3E	<p>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>	
E3F	<p>The affordable workspace elements of a mixed-use scheme should be operational prior to residential elements being occupied.</p>	
<b>Policy E4</b>	<b>Land for industry, logistics and services to support London's economic function</b>	
E4A	<p>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"> <li>1) Light and general industrial uses</li> <li>2) Storage and logistics/distribution including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points</li> <li>3) Secondary materials and waste management</li> <li>4) Utilities infrastructure</li> <li>5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure</li> </ol>	<p>There is a need for 'industrial' land to be broken down into its constituent parts including logistics for both policy, data reporting and analysis purposes, as these land uses can have very different and in some cases conflicting and competing requirements.</p>

	<ul style="list-style-type: none"> <li>6) Wholesale markets</li> <li>7) Emerging industrial-related sectors</li> <li>8) Flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population</li> <li>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').</li> </ul>	
<b>E4B</b>	<p>London's land and premises for industry, logistics and services falls into three categories:</p> <ul style="list-style-type: none"> <li>1) Strategic Industrial Locations (SIL) – see 'Policy E5 Strategic Industrial Locations (SIL)'</li> <li>2) Locally Significant Industrial Sites (LSIS) - see 'Policy E6 Locally Significant Industrial Sites'</li> <li>3) Non-Designated Industrial Sites – sites containing industrial and related functions that are not formally designated as SIL or LSIS in a Local Plan</li> </ul>	
<b>E4C</b>	<p>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, 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'.</p>	<p>Non-designated industrial land –the lack of protection of this industrial land (as it accounts for about a third of the total industrial land in London and will fall outside the 'no net loss' criteria) is a major concern. Changes in land use on such sites could undermine the overall 'no net loss' target, and for such a target to be realistic non-designated land also requires inclusion.</p> <p>The rise of ecommerce and the on-demand economy is likely to lead to every greater mile logistics flows to businesses and private individuals in London over the coming years. This delivery journeys typically involve small vehicles (especially vans). The growth in this activity will require an ever-growing number of local fulfilment centres and depots. If trends of recent decades continue (considering the growth in 'logistics sprawl' in the parcels sector as depots are continuously relocated towards the edge of the city and beyond, due to site prices and refusals for lease renewals), this will result in an ever-increasing number of vehicle trips with growing stem mileages from depots/fulfilment centre to delivery catchment areas in inner and central London. A limited number of ecommerce retailers may be able to afford suitably located sites to service such activity (given their available cash, and a lack of need to generate profits at present, only to gain market share). But most of the logistics industry and all third-party logistics service providers are not in this financial position, and operate</p>

		in a sector with very tight, if any profit margin. Therefore 'logistics sprawl is likely to continue in London and, coupled with the growth in ecommerce and on-demand requirements, will lead to ever-more congested roads into London. Such an outcome will be counter to the Mayor's traffic and environmental targets, and will also lead to deteriorating goods delivery service levels, thereby affecting London's economy. Therefore substantial consideration needs to be given to the (i) future total demand for logistics land taking account of changes in the economy, business and technology, (ii) specifically where such land is required (as it is not necessarily desirable that all available logistics space is in outer London given these changes in demand for logistics operations).
E4D	<p>The retention and provision of additional industrial capacity should be prioritised in locations that:</p> <ol style="list-style-type: none"> <li>1) Are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport</li> <li>2) Provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population</li> <li>3) Provide capacity for micro, small and medium-sized enterprises</li> <li>4) Are suitable for 'last mile' distribution services to support large-scale residential or mixed-use development subject to existing provision.</li> </ol>	
E4E	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.	
E4F	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.	
E4G	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.	
E4H	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.	
Policy E5	<b>Strategic Industrial Locations (SIL)</b>	
E5A	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.	
<b>E5B</b>	<p>Boroughs, in their Development Plans, should:</p> <ol style="list-style-type: none"> <li>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</li> <li>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</li> <li>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 Intensifications, co-location and substitution of land for industry, logistics and services to support London's economic function').</li> </ol>	
<b>E5C</b>	<p>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"> <li>1) Light industrial (Use Class B1c)</li> <li>2) General industrial uses (Use Class B2)</li> <li>3) Storage and logistics/distribution uses (Use Class B8)</li> <li>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</li> <li>5) Flexible B1c/B2/B8 premises suitable for occupation by SMEs</li> <li>6) Small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés.</li> </ol>	
<b>E5D</b>	<p>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>	

E5E	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.	
<b>Policy E6 Locally Significant Industrial Sites</b>		
E6A	In their Development Plans, boroughs should: <ol style="list-style-type: none"> <li>1) Define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews and taking into account 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')</li> <li>2) Make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses.</li> </ol>	
<b>Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</b>		
E7A	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: <ol style="list-style-type: none"> <li>1) Development of mezzanines</li> <li>2) Introduction of small units</li> <li>3) Development of multi-storey schemes</li> <li>4) Addition of basements</li> <li>5) 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</li> </ol>	There are major reservations about the extent to which existing logistics sites can be more intensively developed (with logistics buildings and/or residential or other industrial buildings). The parking, manoeuvring and turning circle requirements of logistics sites need to be taken account of, as well as the attractiveness of such sites to users if they are to be viable for logistics operations. In terms of mezzanine and multi-story logistics developments, these are most likely to remain small in number and built-to-order in London. The operational challenges of operating from such sites as well as the related operational costs will make these unattractive for most operators unless there is a need for a logistics site in a specific area where there are simply no affordable (from a rent point of view) or available alternatives. Automation in supply chains (in materials handling and vehicles) may make such sites more operationally viable over time, but I think this is unlikely in the next 10-20 years.
E7B	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 the 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.	
<b>E7C</b>	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 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.	
<b>E7D</b>	<p>Mixed-use or residential development proposals on Non-designated Industrial Sites will be supported where:</p> <ol style="list-style-type: none"> <li>1) 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</li> <li>2) It has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or</li> <li>3) Industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or</li> <li>4) Suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relation support arrangements for existing businesses before the commencement of new development.</li> </ol> <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>	See response to E4C above.
<b>E7E</b>	<p>The processes set out in Parts B, C and D above must ensure that:</p> <ol style="list-style-type: none"> <li>1) The industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) or capacity in terms of industrial,</li> </ol>	

	<p>storage and warehousing floorspace with appropriate provision of yard space for servicing</p> <ol style="list-style-type: none"> <li>2) The industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service agreements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements</li> <li>3) The intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied</li> <li>4) Appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to: <ol style="list-style-type: none"> <li>a) Safety and security (see 'Policy D10 Safety, security and resilience to emergency' and 'Policy D11 Fire safety')</li> <li>b) The layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see 'Policy T4 Assessing and mitigating transport impacts')</li> <li>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')</li> <li>d) Vibration and noise (see 'Policy D13 noise')</li> <li>e) Air quality, including dust, odour and emissions (see 'Policy S11 Improving air quality' and 'Policy S12 Minimising greenhouse gas emissions').</li> </ol> </li> </ol>	
E7F	<p>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> <ol style="list-style-type: none"> <li>1) This results in mutual advantage to collaboration partners inside and outside London and support a more efficient use of land</li> <li>2) 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</li> </ol>	

	<p>commuting, supply-chain and logistics, congestion, pollution and vehicle miles.</p> <p>3) 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>	
<b>Policy E8</b>	<b>Sector growth opportunities and clusters</b>	
<b>E8A</b>	Employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities.	
<b>E8B</b>	London's global leadership in tech across all sectors should be maximised.	
<b>E8C</b>	<p>The evolution of London's diverse sectors should be supported, ensuring the availability of suitable workspaces including:</p> <ol style="list-style-type: none"> <li>1) Start-up, incubation and accelerator space for micro, small and medium-sized enterprises</li> <li>2) Flexible workspace such as co-working space and serviced offices</li> <li>3) Conventional space for expanding businesses to grow or move on</li> <li>4) Laboratory space and theatre, television and film studio capacity</li> <li>5) Affordable workspace in defined circumstances (see 'Policy E3 Affordable workspace').</li> </ol>	
<b>E8D</b>	Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education institutions and other relevant research and innovation organisations should be encouraged.	
<b>E8E</b>	London's higher and further education institutions and their development across all parts of London should be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged.	
<b>E8F</b>	Clusters such as Tech City and MedCity should be promoted and the development of new clusters should be supported where opportunities exist, such as CleanTech innovation clusters, Creative Enterprise Zones, film, fashion and design clusters, and green enterprise districts such as in the Thames Gateway.	
<b>E8G</b>	In collaboration with the Mayor, boroughs are encouraged to identify and promote the development of Strategic Outer London Development Centres (SOLDC) that	

	<p>have one or more specialist economic functions of greater than sub-regional importance, SOLDCs should be supported by:</p> <ol style="list-style-type: none"> <li>1) Encouraging local innovation to identify and enhance distinct economic strengths</li> <li>2) Co-ordinating infrastructure investment</li> <li>3) Creating a distinct and attractive business offer and public realm</li> <li>4) Ensuring that development complements the growth of town centre and other business locations, and supports the environmental and transport objectives of this Plan</li> <li>5) Bringing forward development capacity</li> <li>6) Improving London's access to employment opportunities.</li> </ol>	
<b>Policy E9</b>	<b>Retail, markets and hot food takeaways</b>	
<b>E9A</b>	<p>A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres ('Policy SD6 Town centres', 'Policy SD7 Town centre network', Policy SD8 Town centres: development principles and Development Plan Documents' and 'Policy SD9 Town centres: Local Partnerships and implementation').</p>	
<b>E9B</b>	<p>In Development Plans, boroughs should:</p> <ol style="list-style-type: none"> <li>1) identify future requirements and locations for new retail development having regard to the town centre policies in the Plan and strategic and local evidence of demand and supply</li> <li>2) identify areas for consolidation of retail space where this is surplus to requirements</li> <li>3) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres</li> <li>4) support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel</li> <li>5) provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping</li> <li>6) identify areas under-served in local convenience shopping and related services and support additional facilities to serve existing or new residential communities in line with town centre 'Policy SD8 Town centres: development principles and Development Plan Documents'</li> </ol>	

	<ul style="list-style-type: none"> <li>7) support the range of London's markets, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres and the Central Activities Zone</li> <li>8) manage existing edge of centre and out of centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses in line with 'Policy SD6 Town centres', 'Policy SD7 Town centre network', 'Policy SD8 Town centres: development principles and Development Plan Documents' and 'Policy SD9 Town centres: Local partnerships and implementation' to realise their full potential for housing intensification, reducing care use and dependency, and improving access by walking, cycling and public transport</li> <li>9) manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including: <ul style="list-style-type: none"> <li>a) town centre vitality, viability and diversity</li> <li>b) sustainability and accessibility</li> <li>c) place-making or local identity</li> <li>d) community safety or security</li> <li>e) mental and physical health and wellbeing</li> </ul> </li> </ul>	
E9C	<p>Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also consider whether it is appropriate to manager an over-concentration of A5 hot food takeaway uses within Local, District and other town centres through the use of locally-defined thresholds in Development Plans.</p>	<p>An issue not raised in the London Plan at present is the last-mile deliveries associated with meals delivered to customers from restaurants and takeaways (with the rise of gig economy platform providers such as Just Eat, Deliveroo, and UberEATS. The growth in this market and the associated vehicle trips by bicycle, moped, motorbike and car has been significant in recent years and is forecast to continue to increase in the coming years. This is thereby resulting in trip generation at such establishments, safety issues concerning pavement use by cyclists and moped riders near to and outside the frontage of such establishments, vehicle noise outside of such establishments often late into the night, increases in road traffic levels associated with meal delivery, and an often environmentally-unfriendly means of food provision and supply.</p> <p>In addition, some of these platform providers are also now developing food factories that provide multiple units to caterers to prepare such meals for delivery (with no access to the public to purchase food in person from them). These 'food factories' are likely to be responsible for significant vehicle trip generation rates, much of which takes place at night and other associated impacts such as noise, but some are being developed in close proximity to residential dwellings.</p>

E9D	Where development proposals involving A5 hot food takeaway uses are permitted, these should be conditioned to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard.	
E9E	Large-scale commercial development proposals (containing over 2,500 sqm gross A Class floorspace) should support the provision of small shops and other commercial units (including affordable units where there is evidence of local need).	
E9F	Development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable (and in accordance with town centre 'Policy SD8 Town centres: development principles and Development Plan Documents) and residential development.	
<b>Policy E10</b>	<b>Visitor infrastructure</b>	
E10A	London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of out London well-connected by public transport, taking into account the needs of business as well as leisure visitors.	
E10B	The special characteristics of major clusters of visitor attractions and the diversity of cultural infrastructure in all parts of London should be conserved, enhances and promoted.	
E10C	A sufficient supply of serviced accommodation for business visitors should be maintained, and the provision of high-quality convention facilities in town centres and in and around the CAZ should be supported.	
E10D	Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in the commercial core parts of the CAZ (see 'Policy SD5 Offices, other strategic functions and residential development in the CAS'), subject to the impact on strategic office space. Intensification of the provision of serviced accommodation in areas of existing concentration should be resisted, except where this will not compromise local amenity or the balance of local land uses.	
E10E	In out London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport, particularly to central London.	
E10F	The role of apart-hotels and short-term lettings should be supported whilst ensuring that they do not compromise housing provision (see 'Policy H11 Ensuring the best use of stock').	

<b>E10G</b>	<p>To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either:</p> <ol style="list-style-type: none"> <li>1) 10 per cent of new bedrooms to be wheelchair-accessible; OR</li> <li>2) 15 per cent of new bedrooms to be accessible rooms in accordance with the following requirements: <ol style="list-style-type: none"> <li>a) one room or five per cent, whichever is the greater, with a wheelchair-accessible shower room for independent use</li> <li>b) a further one room or one per cent, whichever is the greater, with a fixed track-hoist system or similar system with the same degree of convenience and safety as an en-suite bathroom for assisted use, and a connecting door to an adjoining (standard) bedroom for use by an assistance or companion</li> <li>c) one room or five per cent, whichever is the greater with an en-suite shower room to meet the requirement of ambulant disabled people</li> <li>d) four per cent of bedrooms easily adaptable and large enough for easy adaptation to be wheelchair-accessible (with en-suite) if required in the future, and incorporate all the correct dimensions and sanitary layout and be structurally capable of having grab-rails installed quickly and easily if required.</li> </ol> </li> </ol>	
<b>E11</b>	<b>Skills and opportunities for all</b>	
<b>E11A</b>	<p>The Mayor will work with strategic partners to address low pay and supported by his Skills for Londoners Taskforce, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.</p>	
<b>E11B</b>	<p>Development proposal should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that (a) enable trainees to complete their training and apprenticeships, (b) ensure the greatest level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created and increase the proportion of under-represented groups within the construction industry workforce. In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.</p>	
<b>Policy HC1</b>	<b>Heritage conservation and growth</b>	

HC1A	Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to the heritage assets, landscapes and archaeology within their area.	
HC1B	<p>Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:</p> <ol style="list-style-type: none"> <li>1) setting out a clear vision that recognises and embeds the role of heritage in place-making</li> <li>2) utilising the heritage significance of a site or area in the planning and design process</li> <li>3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place</li> <li>4) delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.</li> </ol>	
HC1C	Development proposals affective heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposal should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.	
HC1D	Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protections of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.	
HC1E	Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.	
<b>Policy HC2</b>	<b>World Heritage Sites</b>	

HC2A	Boroughs with World Heritage Sites and those that are neighbours to authorities with World Heritage Sites should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.	
HC2B	Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.	
HC2C	Development Proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its settings, this should be clearly illustrated and assessed in the Heritage Impact Assessment.	
HC2D	Up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.	
<b>Policy HC3</b>	<b>Strategic and Local Views</b>	
HC3A	Strategic Views include significant buildings or urban landscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. The Mayor has designated a list of Strategic Views (Table 7.1) that he will keep under review. Development proposal must be assess for their impact on a designated view if they fall within the foreground, middle ground or background of that view.	
HC3B	Within the designated views, the Mayor will identify landmarks that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.	
HC3C	The Mayor will also identify Strategically-Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will see to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and	

	appreciate the Strategically-Important Landmarks. These and other views are also subject to wider assessment beyond the Protected Vista.	
HC3D	The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.	
HC3E	The Mayor has prepared Supplementary Planning Guidance on the management of the designated views - the London View Management Framework Supplementary Planning Guidance (LVMF SPG). The Mayor will, when necessary, review this guidance.	
HC3F	Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.	
HC3G	Boroughs should clearly identify important local views in their Local Plans and strategies. Boroughs are advised to use the principles of 'Policy HC4 London View Management Framework' for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.	
<b>Policy HC4</b>	<b>London View Management Framework</b>	
HC4A	Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic views and their landmark elements. They should also reserve or enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.	
HC4B	Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly or prominent to the detriment of the view.	
HC4C	Development proposals and external illumination of structure in the background of a view should give context to the landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in in a designated views, and well-preserved within its setting with clear sky behind, it should not be altered by new development appearing its background. Assessment of the impact of development in the foreground, middle ground or background of the view of the setting of a Strategically-Important Landmark should take into account the effects of distance and atmospheric or seasonal changes.	

HC4D	<p>Development proposals in designated views should comply with the following:</p> <ol style="list-style-type: none"> <li>1) London Panoramas should be managed so that development fits within the prevailing pattern of buildings and spaces, and should not detract from the panorama as a whole. the management of views containing Strategically-Important Landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the Strategically-Important Landmark in the foreground, middle ground or background where appropriate</li> <li>2) River Prospects views should be managed to ensure that the juxtaposition between elements, including the river frontages and key landmarks, can be appreciated within their wider London context</li> <li>3) Townscape and Linear Views should be managed so that the ability to see specific buildings, or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, is preserved.</li> </ol>	
HC4E	Viewing places should be accessible and managed so that they enhance people's experience of the view.	
HC4F	<p>Where there is a Protected Vista:</p> <ol style="list-style-type: none"> <li>1) development that exceeds the threshold height of a Landmark Viewing Corridor should be refused</li> <li>2) development in the Wider Setting Consultation Area should form an attractive element in its own right and preserve or enhance the viewer's ability to recognise and to appreciate the Strategically-Important Landmark. It should not cause a canyon effect around the Landmark Viewing Corridor</li> <li>3) development in the background should not harm the composition of the Protected Vistas, nor the viewer's ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not</li> <li>4) development in the foreground of the wider setting consultation area should not detract from the prominence of the Strategically-Important Landmark in this part of the view.</li> </ol>	
Policy HC5	<b>Supporting London's culture and creative industries</b>	
HC5A	The continued growth and evolution of London's diverse cultural facilities and creative industries is supported. In Local Plans and through planning decision, boroughs should:	

	<ol style="list-style-type: none"> <li>1) protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity</li> <li>2) identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal</li> <li>3) identify, protect and enhance strategic clusters of cultural attractions</li> <li>4) consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas</li> <li>5) seek to ensure the Opportunity Areas and large-scale mixed-use developments include new cultural venues and/or facilities and spaces for outdoor cultural events.</li> </ol>	
HC5B	<p>Boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise Zones in Local Plans:</p> <ol style="list-style-type: none"> <li>1) in areas that have emerging or existing clusters of creative industries; or</li> <li>2) in areas of identified demand and more deprived areas where there is evidence that the designation of a Creative enterprise Zone will enhance the local economy and provide facilities and workspace for the creative industries.</li> </ol>	
HC5C	<p>Where a Creative Enterprise Zone has been identified, Local Plan policies should:</p> <ol style="list-style-type: none"> <li>1) develop, enhance, protect and manage new and existing creative workspace, providing flexibility for changing business needs, and an attractive business environment including related ancillary facilities</li> <li>2) support existing, and the development of new, cultural venues within the Creative Enterprise Zone</li> <li>3) help deliver spaces that are suitable, attractive and affordable for the creative industries, taking into account the particular requirements of established and emerging creative businesses in the Creative Enterprise Zone in accordance with 'Policy E2 Low-cost business space', 'Policy E4 Land for industry, logistics and services to support London's economic function' and 'Policy E8 Sector growth opportunities and clusters'</li> <li>4) encourage the temporary use of vacant buildings and sites for creative workspace and activities</li> </ol>	

	<ul style="list-style-type: none"> <li>5) integrate public transport, digital and other infrastructure and service provision such as leisure, recreation and community facilities in the establishment and development of the Creative Enterprise Zone</li> <li>6) support a mix of uses which derive mutual benefits from, and do not compromise, the creative industries and cultural facilities in the Creative Enterprise Zone in line with the Agent of Change principle (see 'Policy D12 Agent of Change')</li> <li>7) contribute to the achievement of wider objectives for the business location such as the economic vitality and diversity of a town centre of the intensification of an industrial area.</li> </ul>	
<b>Policy HC6</b>	<b>Supporting the night-time economy</b>	
<b>HC6A</b>	Boroughs should develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of night-time activity (see Table A1.1 and Figure 7.7), building on the Mayor's Vision for London as a 24-Hour City.	
<b>HC6B</b>	<p>In Development Plans, town centre strategies and planning decision, boroughs should:</p> <ul style="list-style-type: none"> <li>1) promote the night-time economy, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available</li> <li>2) improve inclusive access and safety, and make the public realm welcoming for all night-time economy users and workers</li> <li>3) diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafes, libraries, galleries and museums</li> <li>4) address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, and see way to diversify and managed these areas</li> <li>5) ensure night-time economy venues are well-served with safe and convenient night-time transport</li> <li>6) protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues.</li> </ul>	
<b>HC6C</b>	Promoting management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should be supported.	

	Boroughs should work closely with stakeholders such as the police, local businesses, patrons, workers and residents.	
<b>Policy HC7</b>	<b>Protecting public houses</b>	
<b>HC7A</b>	<p>Boroughs should:</p> <ol style="list-style-type: none"> <li>1) protect public houses where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres, night-time economy areas and Creative Enterprise Zones</li> <li>2) support proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.</li> </ol>	
<b>HC7B</b>	Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.	
<b>HC7C</b>	Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house that would compromise the operation or viability of the public house use should be resisted.	
<b>Policy G1</b>	<b>Green infrastructure</b>	
<b>G1A</b>	London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features or green infrastructure.	
<b>G1B</b>	Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, floor management, health and wellbeing, sport and recreation.	
<b>G1C</b>	<p>Development Plans and Opportunity Area Planning Frameworks should:</p> <ol style="list-style-type: none"> <li>1) identify key green infrastructure assets, their function and their potential function</li> <li>2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.</li> </ol>	
<b>Policy G2</b>	<b>London's Green Belt</b>	
<b>G2A</b>	<p>The Green Belt should be protected from inappropriate development:</p> <ol style="list-style-type: none"> <li>1) development proposals that would harm the Green Belt should be refused</li> <li>2) the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.</li> </ol>	

<b>G2B</b>	The extension of the Green Belt will be supported, where appropriate. It's de-designation will not.	
<b>Policy G3</b>	<b>Metropolitan Open Land</b>	
<b>G3A</b>	Metropolitan Open Land (MOL) should be protected from inappropriate development: <ol style="list-style-type: none"> <li>1) development proposals that would harm MOL should be refused</li> <li>2) boroughs should work with partners to enhance the quality and range of uses of MOL.</li> </ol>	
<b>G3B</b>	The extension of MOL designations should be supported where appropriate.	
<b>G3C</b>	Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.	
<b>G3D</b>	Boroughs should designate MOL by establishing that the land meets at least one of the following criteria: <ol style="list-style-type: none"> <li>1) it contributes to the physical structure of London by being clearly distinguishable from the build-up area</li> <li>2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London</li> <li>3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value</li> <li>4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.</li> </ol>	
<b>Policy G4</b>	<b>Local green and open space</b>	
<b>G4A</b>	Local green and open spaces should be protected.	
<b>G4B</b>	The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.	
<b>G4C</b>	Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required. <a href="http://www.gigl.org.uk/open-spaces/areas-of-deficiency-in-access-to-public-open-space/">http://www.gigl.org.uk/open-spaces/areas-of-deficiency-in-access-to-public-open-space/</a>	
<b>G4D</b>	The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.	

G4E	<p>Development Plans and Opportunity Area Frameworks should:</p> <ol style="list-style-type: none"> <li>1) include appropriate designations and policies for the protection of green and open space to address deficiencies</li> <li>2) ensure that future green and open space needs are planned for in areas with the potential for substantial change</li> <li>3) ensure that green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.</li> </ol>	
<b>Policy G5 Urban greening</b>		
G5A	<p>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>	
G5B	<p>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 predominantly residential, and a target score of 0.3 for predominantly commercial development.</p>	
<b>Policy G6 Biodiversity and access to nature</b>		
G6A	<p>Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.</p>	
G6B	<p>In developing Development Plan policies, boroughs should:</p> <ol style="list-style-type: none"> <li>1) use the relevant procedures to identify SINCs and green corridors. When undertaking comprehensive reviews of the SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board</li> <li>2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them</li> <li>3) seek opportunities to create habitats that are of particular relevance and benefit in an urban context</li> <li>4) include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations</li> </ol>	

	5) ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed.	
<b>G6C</b>	Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts: <ol style="list-style-type: none"> <li>1) avoid adverse impact to the special biodiversity interest of the site</li> <li>2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site</li> <li>3) seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.</li> </ol>	
<b>G6D</b>	Biodiversity enhancement should be considered from the start of the development process.	
<b>G6E</b>	Proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.	
<b>Policy G7</b>	<b>Trees and woodlands</b>	
<b>G7A</b>	Trees and woodlands should be protected, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest - the area of London under the canopy of trees.	
<b>G7B</b>	In their Development Plans, boroughs should: <ol style="list-style-type: none"> <li>1) protect 'veteran' trees and ancient woodland where these are already part of a protected site</li> <li>2) identify opportunities for tree planting in strategic locations.</li> </ol>	
<b>G7C</b>	Development proposal should ensure that, wherever possible, existing trees of quality are retained <a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland">[https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland]</a> . If it is imperative that trees have to be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT. The planting of additional trees should generally be included in new developments - particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.	
<b>Policy G8</b>	<b>Food growing</b>	
<b>G8A</b>	In Development Plans, boroughs should:	

	<ol style="list-style-type: none"> <li>1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within new developments</li> <li>2) identify potential sites that could be used for commercial food production.</li> </ol>	
<b>Policy G9</b>	<b>Geodiversity</b>	
<b>G9A</b>	<p>In Development Plans, boroughs should:</p> <ol style="list-style-type: none"> <li>1) establish clear goals for the management of identified sites to promote public access, appreciation and interpretation of geodiversity</li> <li>2) ensure geological sites of European, national or regional conservation importance are clearly identified.</li> </ol>	
<b>G9B</b>	<p>Where relevant, development proposals should:</p> <ol style="list-style-type: none"> <li>1) make a positive contribution to the protection and enhancement of geodiversity</li> <li>2) protect Regionally Important Geological Sites (RIGS)</li> <li>3) give Locally Important Geological Sites (LIGS) the level of protection commensurate with their importance.</li> </ol>	
<b>Policy S11</b>	<b>Improving air quality</b>	
<b>S11A</b>	<p>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"> <li>1) Development proposals should not: <ol style="list-style-type: none"> <li>a) lead to further deterioration of existing poor air quality</li> <li>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</li> <li>c) reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality</li> <li>d) create unacceptable risk of high levels of exposure to poor air quality</li> </ol> </li> <li>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 of people particularly vulnerable to poor air quality, such as children or older people.</li> <li>3) The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact</li> </ol>	

	<p>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.</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>6) Development proposal 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.</li> </ol>	
<b>Policy S12</b>	<b>Minimising greenhouse gas emissions</b>	
<b>S12A</b>	<p>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"> <li>1) Be lean: use less energy and manage demand during construction and operation.</li> <li>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 S13 Energy infrastructure'.</li> <li>3) Be green: generate, store and use renewable energy on-site.</li> </ol>	
<b>S12B</b>	<p>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>	
<b>S12C</b>	<p>In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations 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"> <li>1) through a cash in lieu contribution to the relevant borough's carbon offset fund, and/or</li> </ol>	

	2) off-site provided that an alternative proposal is identified and delivery is certain.	
<b>SI2D</b>	Boroughs must establish and administer a carbon offset fund. Offset fund payment must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.	
<b>Policy SI3</b>	<b>Energy infrastructure</b>	
<b>SI3A</b>	Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.	
<b>SI3B</b>	Energy masterplans should be developed for large-scale development locations which establish the most effective energy supply options. Energy masterplans should identify: <ol style="list-style-type: none"> <li>1) major heat load (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)</li> <li>2) heat loads from existing building that can be connected to future phases of a heat network</li> <li>3) major heat supply plant</li> <li>4) possible opportunities to utilise energy from waste</li> <li>5) secondary heat sources</li> <li>6) opportunities for low temperature heat networks</li> <li>7) possible land for energy centres and/or energy storage</li> <li>8) possible heating and cooling network routes</li> <li>9) opportunities for futureproofing utility infrastructure networks to minimise the impact from road works</li> <li>10) infrastructure and land requirements for electricity and gas supplies</li> <li>11) implement options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.</li> </ol>	
<b>SI3C</b>	Development Plans should: <ol style="list-style-type: none"> <li>1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including upgrades to existing infrastructure</li> <li>2) identify existing heating and cooling networks and opportunities for expanding existing networks and establishing new networks.</li> </ol>	
<b>SI3D</b>	Major development proposals within Heat Network Priority Areas should have a communal heating system	

	<ol style="list-style-type: none"> <li>1) the heat source for the communal heat sources should be selected in accordance with the following eating hierarchy: <ol style="list-style-type: none"> <li>a) connect to local existing or planned heat networks</li> <li>b) use available local secondary heat sources (in conjunction with heat pump, if required, and a lower temperature heating system)</li> <li>c) generate clean heat and/or power from zero-emission sources</li> <li>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)</li> <li>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 emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)</li> <li>f) use ultra-low NOx gas boilers</li> </ol> </li> <li>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.</li> <li>3) Where a heat network is planned but not yet in existence the development should be designed for connection at a later date.</li> </ol>	
<b>Policy S14</b>	<b>Managing heat risk</b>	
<b>S14A</b>	Development proposals should minimise internal heat gain and the impacts of the urban heat island through design, layout, orientation and materials.	
<b>S14B</b>	<p>Major development proposals should demonstrate through an energy strategy ow they will reduce the potential for overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:</p> <ol style="list-style-type: none"> <li>1) minimise internal heat generation through energy efficient design</li> <li>2) reduce the amount of heat entering a building through orientation, shading albedo, fenestration, insulation and the provision of green roofs and walls</li> <li>3) manage the heat within the building through exposed internal thermal mass and high ceilings</li> <li>4) provide passive ventilation</li> <li>5) provide mechanical ventilation</li> <li>6) provide active cooling systems</li> </ol>	

<b>Policy SI5</b>	<b>Water infrastructure</b>	
<b>SI5A</b>	In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.	
<b>SI5B</b>	Development Plans should promote improvements to water supply infrastructure to ensure security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account.	
<b>SI5C</b>	Development proposals should: <ul style="list-style-type: none"> <li>1) minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)</li> <li>2) achieve at least the BREEAM excellent standard (commercial development)</li> <li>3) be encouraged to incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to minimise future-proofing.</li> </ul>	
<b>SI5D</b>	In terms of water quality Development Plans should: <ul style="list-style-type: none"> <li>1) promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans</li> <li>2) support strategic wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Such infrastructure should be constructed in a timely and sustainable manner taking account of new, smart technologies, intensification opportunities on existing sites, and energy implications. Boroughs should work with Thames Water in relation to local wastewater infrastructure requirements.</li> </ul>	
<b>SI5E</b>	Development proposals should: <ul style="list-style-type: none"> <li>1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided</li> <li>2) be designed to ensure that misconnections between foul and surface water networks are eliminated and not easily created through future building alterations.</li> </ul>	
<b>SI6</b>	<b>Digital connectivity infrastructure</b>	
<b>SI6A</b>	To ensure London' global competitiveness now and in the future, development proposal should:	

	<ol style="list-style-type: none"> <li>1) achieve greater digital connectivity than set out in part R1 of the Building Regulations</li> <li>2) ensure that sufficient ducting space for future digital connectivity infrastructure is provided</li> <li>3) meet requirement for mobile connectivity with the development and take appropriate mitigation measures to avoid reducing mobile connectivity in surrounding areas</li> <li>4) support the effective use of the public realm (such as street furniture and bins) to accommodate well-designed and located mobile digital infrastructure.</li> </ol>	
<b>Policy S17 Reducing waste and supporting the circular economy</b>		
<b>S17A</b>	<p>Waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by:</p> <ol style="list-style-type: none"> <li>1) promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible</li> <li>2) encouraging waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of products</li> <li>3) ensuring that there is zero biodegradable or recyclable waste to landfill by 2026</li> <li>4) meeting or exceeding the recycling targets for each of the following waste streams and generating low-carbon energy in London from suitable remaining waste: <ol style="list-style-type: none"> <li>a) municipal waste - 65 per cent by 2030</li> <li>b) construction, demolition and excavation waste - 95 per cent by 2020</li> </ol> </li> <li>5) designing developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.</li> </ol>	
<b>S17B</b>	<p>Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:</p> <ol style="list-style-type: none"> <li>1) how all materials arising from demolition and remediation works will be re-used and/or recycled</li> </ol>	

	<ol style="list-style-type: none"> <li>2) how the proposal's design and construction will enable building materials, components and products to be disassembled and re-used at the end of their useful life</li> <li>3) opportunities for managing as much waste as possible on site</li> <li>4) adequate and easily accessible storage space to support recycling and re-use</li> <li>5) how much waste the proposal is expected to generate, and how and where the waste will be handled.</li> </ol>	
<b>Policy S18</b>	<b>Waste capacity and net waste self-sufficiency</b>	
<b>S18A</b>	<p>In order to manage London's waste sustainably:</p> <ol style="list-style-type: none"> <li>1) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026</li> <li>2) existing waste management sites should be safeguarded (see 'Policy S19 Safeguarded waste sites')</li> <li>3) the waste management capacity of existing sites should be optimised</li> <li>4) new waste management sites should be provided where required</li> <li>5) environmental, social and economic benefits from waste and secondary materials management should be created.</li> </ol>	
<b>S18B</b>	<p>Development Plans should:</p> <ol style="list-style-type: none"> <li>1) identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantum of waste will be managed</li> <li>2) allocate sufficient land and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 - boroughs are encouraged to collaborate by pooling their apportionment requirements</li> <li>3) identify the following as suitable locations to manage borough waste apportionments: <ol style="list-style-type: none"> <li>a) existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity</li> <li>b) Strategic Industrial Locations and Locally Significant Employment Sites/land</li> <li>c) safeguarded wharves with an existing or future potential for waste and secondary material management.</li> </ol> </li> </ol>	
<b>S18C</b>	<p>The following are particularly encouraged - development proposals which:</p> <ol style="list-style-type: none"> <li>1) deliver a range of complementary waste management and secondary material processing facilities on a single site</li> </ol>	

	<ol style="list-style-type: none"> <li>2) support prolonged product life and production of secondary materials including repair, refurbishment and remanufacture</li> <li>3) contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste</li> <li>4) provide combined heat and power and/or combined cooling heat and power</li> <li>5) contain proposals to effectively deal with CD&amp;E waste on site and minimise export to landfill</li> </ol>	
<b>SI8D</b>	<p>Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:</p> <ol style="list-style-type: none"> <li>1) the nature of the activity, its scale and location</li> <li>2) job creation and social value benefits including skills, training and apprenticeships opportunities</li> <li>3) achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings - facilities generating energy from waste will need to meet , or demonstrate that steps are in place to meet, a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced.</li> <li>4) the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) - where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed</li> <li>5) the transport and environmental impacts of all vehicle movements related to the proposal - the use renewable fuels from waste sources and the use of rail waterway networks to transport waste should be supported.</li> </ol>	
<b>Policy SI9</b>	<b>Safeguarded waste sites</b>	
<b>SI9A</b>	Existing waste sites should be safeguarded and retained in waste management use.	
<b>SI9B</b>	Waste facilities located in areas identified for non-waste related development should be integrated with other uses as a first principle where they deliver clear local benefits.	
<b>SI9C</b>	Waste plans should be adopted before considering the loss of waste sites. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.	
<b>Policy SI10</b>	<b>Aggregates</b>	

SI10A	<p>An adequate supply of aggregates to support construction in London will be achieved by:</p> <ol style="list-style-type: none"> <li>1) encouraging re-use and recycling of construction, demolition and excavation waste within London</li> <li>2) extracting land-won aggregates within London</li> <li>3) importing aggregates to London by sustainable transport modes</li> <li>4) meeting the target of 95 per cent recycling/re-use of construction, demolition and excavation waste by 202 and recycling 50 per cent of that waste as aggregates by 2020.</li> </ol>	
SI10B	<p>Development Plans should make provision for the maintenance of a landbank (i.e. seven years' supply) of at least five million tonnes of land-won aggregates up to 2041, in particular through a landbank apportionment of:</p> <ol style="list-style-type: none"> <li>1) at least 1.7 mt to London Borough of Havering</li> <li>2) at least 0.7 mt to London Borough of Redbridge</li> <li>3) at least 1.75 mt to London Borough of Hillingdon</li> <li>4) at least 0.7 mt to London Borough of Hounslow.</li> </ol>	
SI10C	<p>All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities.</p>	
SI10D	<p>To reduce the environmental impact of aggregates, Development Plans should:</p> <ol style="list-style-type: none"> <li>1) ensure that appropriate use is made of planning conditions dealing with aftercare, restoration and re-use of minerals sites following extraction, with particular emphasis on promoting green infrastructure, especially biodiversity</li> <li>2) safeguard wharves and/or railheads with existing or potential capacity for aggregate distribution and/or processing to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.</li> </ol>	
<b>Policy SI11</b>	<b>Hydraulic fracturing (Fracking)</b>	
SI11A	<p>Development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing should be refused.</p>	
<b>Policy SI12</b>	<b>Flood risk management</b>	
SI12A	<p>Current and expected flood risk from all sources across London should be managed in a sustainable and cost effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.</p>	
SI12B	<p>Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Surface Water Management Plan, where necessary, to identify areas where particular flood risk issues exist and develop</p>	

	action and policy approaches aimed at reducing these risks. Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.	
SI12C	Development proposals which require specific flood risk assessments should ensure that flood risk is minimised and mitigated, and the residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.	
SI12D	Development Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.	
SI12E	Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed to remain operational under flood conditions and buildings should be designed for quick recover following a flood.	
SI12F	Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Where possible, development proposals should set permanent built development back from flood defences to allow for any foreseeable future upgrades.	
<b>Policy SI13</b>	<b>Sustainable drainage</b>	
SI13A	Lead Local Flood Authorities should identify - through their Local Flood Risk Management Strategies and Surface Water Management Plans - areas where there are particular surface water management issues and aim to reduce these risks.	
SI13B	Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy: <ol style="list-style-type: none"> <li>1) rainwater harvesting (including a combination of green and blue roofs)</li> <li>2) infiltration techniques and green roofs</li> <li>3) rainwater attenuation in open water features for gradual release</li> <li>4) rainwater discharge direct to a watercourse unless not appropriate)</li> <li>5) rainwater attenuation above ground (including blue roofs)</li> <li>6) rainwater attenuation below ground</li> <li>7) rainwater discharge to a surface water sewer or drain</li> <li>8) rainwater discharge to a combined sewer</li> </ol>	
SI13C	Development proposals for impermeable paving should be refused where appropriate, including on small surfaces such as front gardens and driveways.	

SI13D	Drainage should be designed and implemented in ways that address issues of water use efficiency, river water quality, biodiversity, amenity and recreation.	
<b>Policy SI14</b>	<b>Waterways - strategic role</b>	
SI14A	To ensure coordination and alignment at the interface between terrestrial and marine planning, Development Plans and development proposals should take account of the emerging Marine Spatial Plans prepared by the Marine Management Organisation.	
SI14B	To reflect the distinctiveness of areas that specifically relate to the River Thames, relevant Development Plans should designate, and ensure the maintenance of, Thames Policy Areas. Boroughs are encouraged to work together on policies and to develop and update joint Thames Strategies that should support individual Development Plans.	
<b>Policy SI15</b>	<b>Water transport</b>	
SI15A	Development proposals should protect and enhance existing passenger transport piers and their capacity. New piers will be supported in line with the Port of London Authority and Transport for London's Pier Strategy. The necessary provision of moorings, waste and sewage facilities for passenger vessels should be provided.	
SI15B	Existing boatyard sites should be protected and development proposals to increase their capacity or range of services should be supported. Alternative use of a boatyard site should be accepted if the facilities of the site are re-provided at a site with equivalent or enhanced facilities. Proposals for a new strategic-scale boatyard site, at an appropriate site within London, will be supported.	
SI15C	Development proposals to facilitate an increase in the amount of freight transported by river should be supported.	
SI15D	The Mayor will keep the network of safeguarded wharves under regular review. Boroughs should protect existing locations and identify new locations for additional waterborne freight. There may be opportunities to consolidate wharves as part of strategic land use change, in particular, within Opportunity Areas; these will need to ensure that the capacity and operability of the wharves is retained and where possible expanded.	
SI15E	Safeguarded wharves should only be used for waterborne freight-handling use, including consolidation centres. The redevelopment of safeguarded wharves other land uses should be accepted if the wharf is no longer viable or capable of being made viable for waterborne freight-handling (see viability testing criteria). Temporary uses should only be allowed where they do not preclude the wharf being reused for waterborne freight-handling uses.	

SI15F	Development proposals which increase the use of safeguarded wharves for waterborne freight transport, especially on wharves which are currently not handling freight by water, will be supported.	
SI15G	Development proposals that include the provision of a water freight use on a safeguarded wharf, with other land uses above or alongside, will need to ensure that the development is designed so that there are no conflicts of use and that the freight-handling capacity of the wharf is not reduced.	
SI15H	Development proposals adjacent to or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance, in line with Agent of Change principle.	
SI15I	Development proposals close to navigable waterways should maximise water transport for bulk materials during demolition and construction phases.	
<b>Policy SI16</b>	<b>Waterways - use and enjoyment</b>	
SI16A	Development Plans should protect and enhance waterway infrastructure to enable water-dependent uses.	
SI16B	Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally and if the infrastructure does not negatively impact on navigation.	
SI16C	Development proposals for cultural, educational and community facilities and events should be supported and promoted, but should take into consideration the protection and other uses of the waterways.	
SI16D	New mooring facilities should be: <ul style="list-style-type: none"> <li>1) supported as part of development proposals, but should be off-line from main navigation routes, in basins or docks, unless there are no negative impacts on navigation</li> <li>2) managed in a way that respects the character of the waterways.</li> </ul>	
SI16E	Major development schemes adjacent to waterways should consider the provision of new moorings.	
SI16F	Existing access points to waterways (including slipways and historic steps) and alongside waterways (including paths) should be protected and enhanced.	
SI16G	Development proposals along waterways should explore opportunities for new, extended, improved and inclusive access infrastructure.	
SI16H	Development proposals should improve and expand the Thames Path and the towpaths and provide better linkages to the transport network. This will require collaboration with relevant partners including the London boroughs, the PLA and the Canal and River Trust, the Environment Agency and Natural England, as well as	

	landowner, developer and community representatives. These paths will be public and not private spaces.	
<b>Policy SI17</b>	<b>Protecting London's waterways</b>	
<b>SI17A</b>	Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and increase the heritage and habitats value, should be supported if appropriate. Development proposals to impound constrain waterways should be refused.	
<b>SI17B</b>	Development proposals should support and improve the protection of the distinct open character and heritage of waterways.	
<b>SI17C</b>	Development proposals into the waterways, including permanently moored vessels and development into the waterways should generally only be supported for water-related uses.	
<b>SI17D</b>	Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character and environment and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness.	
<b>SI17E</b>	On-shore power at water transport facilities should be provided at wharves and residential moorings to help reduce air pollution.	
<b>Policy T1</b>	<b>Strategic approach to transport</b>	
<b>T1A</b>	Development Plans and development proposals should support: <ul style="list-style-type: none"> <li>1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041</li> <li>2) the proposal transport schemes set out in Table 10.1</li> </ul>	
<b>T1B</b>	All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.	No mention is made of effective use of land to encourage efficient forms of freight transport for goods and services.
<b>Policy T2</b>	<b>Healthy Streets</b>	
<b>T2A</b>	Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.	
<b>T2B</b>	Development Plans should: <ul style="list-style-type: none"> <li>1) promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improved health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use;</li> </ul>	

	<p>improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.</p> <p>2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.</p>	
T2C	In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active and public transport travel. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.	
T2D	<p>Development proposals should:</p> <ol style="list-style-type: none"> <li>1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance.</li> <li>2) reduce the dominance of vehicles on London's streets whether stationary or moving.</li> <li>3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.</li> </ol>	
<b>Policy T3</b>	<b>Transport capacity, connectivity and safeguarding</b>	
T3A	Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections.	
T3B	<p>Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by:</p> <ol style="list-style-type: none"> <li>1) safeguarding existing land and buildings used for transport or support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)</li> <li>2) identifying and safeguarding new sites and route alignments, as well as supporting infrastructure, in order to provide transport functions and planned changes to capacity, including proposals identified in Table 10.1</li> <li>3) safeguarding the Walk London Network, protecting access to and improving the Thames Path and, where relevant, improving its alignment with the Thames.</li> </ol>	

T3C	Development proposals that do not provide adequate protection for the schemes outlined in Table 10.1 or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused.	
T3D	In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line.	
T3E	Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.	
<b>Policy T4</b>	<b>Assessing and mitigating transport impacts</b>	
T4A	Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.	
T4B	Transport assessments should be submitted with development proposals to ensure that any impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel plans, parking design and management plans, construction logistics plans and delivery and servicing plans will be required in accordance with relevant Transport for London guidance. [ <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications">https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications</a> ]	
T4C	Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address any adverse transport impacts that are identified.	
T4D	Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission may be contingent on the provision of necessary public transport and active travel infrastructure.	
T4E	The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.	

T4F	Development proposals should not increase road danger.	
<b>Policy T5</b>	<b>Cycling</b>	
T5A	<p>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:</p> <ol style="list-style-type: none"> <li>1) supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure</li> <li>2) securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located Development 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. <a href="https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2">[https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2]</a></li> </ol>	
T5B	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.	
T5C	Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work developers to propose alternative solutions which meet the objectives of the standards. These may include option such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.	
T5D	Where flexible commercial uses are proposed and exact uses are not determined at the point application, the highest potential applicable cycle parking standard should be applied.	
T5E	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.	
T5F	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.	
<b>Policy T6</b>	<b>Car parking</b>	

T6A	Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.	
T6B	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 development elsewhere designed to provide the minimum necessary parking ('car-lite').	
T6C	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 with Development Plans.	
T6D	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'.	
T6E	Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emissions vehicles.	
T6F	Adequate provision should be made for efficient deliveries and servicing.	
T6G	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.	
T6H	Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. Out London boroughs wishing to adopt minimum residential parking standards through a Development Plans Document (within the maximum standards set out in 'Policy T6.a 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.	
T6I	Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.	
<b>Policy T6.1</b>	<b>Residential parking</b>	
T6.1A	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.	
T6.1B	Parking spaces within communal car parking facilities (including basements) should be leased rather than sold.	

T6.1C	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.	
T6.1D	Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking.	
T6.1E	Large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free.	
T6.1F	The provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.	
T6.1G	<p>Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:</p> <ol style="list-style-type: none"> <li>1) ensure that at least one designated disabled persons parking bay per dwelling for three per cent of dwellings is available from the outset</li> <li>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.</li> </ol>	
T6.1H	<p>All disabled persons parking bays associated with residential development must:</p> <ol style="list-style-type: none"> <li>1) be for residents' use only (whether M4(2) or M4(3) dwellings)</li> <li>2) not be allocated to specific dwellings, unless provided within the curtilage of the dwelling</li> <li>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)</li> <li>4) count towards the maximum parking provision for the development</li> <li>5) be designed in accordance with the design guidance in BS8300 vol. 1</li> <li>6) be located to minimise the distance between disabled persons parking bays 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.</li> </ol>	
<b>Policy T6.2</b>	<b>Office parking</b>	
T6.2A	The maximum parking standards set out in Table 10.4 should be applied to new office development.	

T6.2B	In well-connected parts of outer London, including town centres, in close proximity to stations and in Opportunity Areas, office developments are encouraged to be car-free.	
T6.2C	Car parking standards for Use Classes Order B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to these office parking standards, take account of the significantly lower employment density in such developments, and consider a degree of flexibility to reflect different trip-generating characteristics.	
T6.2D	Outer London boroughs wishing to adopt more generous standards are required to do so through an evidence-based policy in their Development Plan that identifies the parts of the borough in which the higher standards will be applied, and justifies those standards, including: <ol style="list-style-type: none"> <li>1) the provision and operation of (existing and future) public transport, especially in relation to bus reliability</li> <li>2) the impact on the ability to deliver Healthy Streets, promote active travel and deliver mode shift</li> <li>3) the impact on congestion and air quality locally and on neighbouring boroughs and districts outside London as appropriate</li> <li>4) a commitment to increase or enhance publicly-available cycle parking</li> <li>5) a requirement (via Travel Plans) to reduce car parking provision over time and convert it to other uses.</li> </ol>	
T6.2E	Boroughs should not seek to adopt more generous standards borough-wide.	
T6.2F	Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces.	
T6.2G	A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision.	
T6.2H	Disabled persons parking should be provided as set out in 'Policy T6.5 Non-residential disabled persons parking'.	
<b>Policy T6.3</b>	<b>Retail parking</b>	
T6.3A	The maximum parking standards set out in Table 10.5 should be applied to new retail development.	
T6.3B	To make the most efficient use of land, the starting point for assessing the need for parking provision at all new retail development should be the use of existing public provision, such as town centre parking.	
T6.3C	Opportunities should be sought to make the most of all existing parking, for example using office parking for retail outside working hours. Where shared	

	parking is identified, overall provision should be reduced to make better use of land and more intensively use the parking that remains.	
T6.3D	If on-site parking is justified it should be publicly-available.	
T6.3E	Disable persons parking should be provided as set out in 'Policy T6.5 Non-residential disabled persons parking'.	
<b>Policy T6.4</b>	<b>Hotel and leisure uses parking</b>	
T6.4A	In the CAZ and locations with a PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.	
T6.4B	In locations of PTAL 0-3, schemes should be assess on a case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels.	
T6.4C	All operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces.	
T6.4D	Disabled persons parking should be provided as set out in 'Policy T6.5 Non-residential disabled persons parking'.	
<b>Policy T6.5</b>	<b>Non-residential disabled persons parking</b>	
T6.5A	All non-residential elements of a development should provide at least one on or off-street disabled persons parking bay.	
T6.5B	Disabled persons parking should be provided in accordance with the levels set out in Table 10.6.	
T6.5C	Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with.	
T6.5D	Designated bays should be marked up as disabled persons parking bays from the outset.	
T6.5E	Enlarged bays should be large enough to become disabled persons parking bays quickly and easily via the marking up of appropriate hatchings and symbols and the provision of signage, if required i.e. if it can be demonstrated that the existing level of disabled persons parking is not adequate.	
T6.5F	Designated disabled persons parking bays and enlarged bays should be designed in accordance with the design guidance provided in BS3800: Vol 1.	
<b>Policy T7</b>	<b>Freight and servicing</b>	
T7A	Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight and servicing strategies. These should seek to: 1) reduce freight trips to, from and within these areas	Needs to be reflected in policy SD1A which currently doesn't include any reference to freight (goods and servicing). Also needs to include that the goods and servicing needs of Opportunity Areas are assessed at the planning phase (both for

	<ol style="list-style-type: none"> <li>2) coordinate the provision of infrastructure and facilities to manager freight and servicing at an area-wide level</li> <li>3) seek to reduce emissions from freight, such as through sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.</li> </ol> <p>Such strategies should be developed through policy or through the formulation of a masterplan for a planning application.</p>	<p>commercial and residential development), so that adequate freight transport infrastructure can be accommodated into the plans. This includes suitable on- and off-street loading/unloading infrastructure and innovative schemes for last-mile deliveries to residents.</p>
T7B	<p>To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.</p>	
T7C	<p>Wharves and railheads involved in the distribution of aggregates should be safeguarded in line with 'Policy SI9 Safeguarded waste sites', 'Policy SI10 Aggregates' and 'Policy SI5 Water infrastructure'.</p>	
T7D	<p>Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.</p>	<p>Designing new sites for 24-hour operations will not overcome existing barriers to increasing off peak goods and servicing operations at sites due to such design specification would only apply to new builds, whereas many existing sites are subject to time restrictions of goods deliveries and collections imposed as part of planning conditions, or on environmental health grounds due to noise. Much progress on off peak deliveries has been achieved in other cities outside the UK, which has targeted the achievement of quieter delivery operations (associated with the vehicle, driver, materials handing activities, loading bay and handling equipment) and which has facilitated off peak delivery activity that that London could learn from.</p>
T7E	<p>Development proposals for new consolidation and distribution facilities should be supported provided that they:</p> <ol style="list-style-type: none"> <li>1) deliver mode shift from road to rail or water without adversely impacting passenger services (existing or planned) and without generating significant increases in street-based movements</li> <li>2) reduce traffic volumes within London</li> <li>3) reduce emissions from freight and servicing trips</li> <li>4) enable sustainable last-mile movements, including by cycle and electric vehicle.</li> </ol>	<p>The MTS has placed much emphasis on freight consolidation and the use of consolidation centres, probably located in outer London that are capable of handling larger product flows ultimately destined for offices, shops, hospitals, hotels, council and governmental buildings, construction sites and other land uses. The urban consolidation centres do not necessarily need to be stand-alone dedicated, purpose-built facilities. Instead, in order to make them economically viable they are likely to be shared-use warehousing sites. However, the Mayor has provided little in the way of funding or site provision to encourage these developments and overcome the additional operating costs that can be involved in introducing this additional leg into the logistics supply chain.</p> <p>As previously mentioned against policy SD4M, several innovative, sustainable freight transport operations require the use of small, suitably located depots especially in inner and central London. However, at present market forces mean that such land is unaffordable to logistics operators. However, the Mayor, London boroughs and other</p>

		<p>public sector organisations have considerable land portfolios that are not needed for their current business. There is therefore scope for these public sector organisations to find ways in which suitable land can be made available at affordable prices for sustainable freight transport and logistics operations. Given the stated sustainable transport aspirations of London's Mayor and its 33 boroughs this would seem to be a good opportunity to demonstrate and support integrated land-use and freight transport planning in London. However, most of these public organisations seem more concerned with income generation and maximisation (through releasing such land for uses and developments with higher financial returns than logistics). This is leading to a fundamental mismatch between the stated sustainable freight transport objectives and targets and sufficiently strong policy actions needed to support and achieve these sustainability objectives.</p>
T7F	<p>Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.</p>	<p>Ideas that should be explored as means by which to reduce freight trip generation and improves the operational efficiency of these freight activities in London include: considerations of how planning law could be used (in relation to either new builds or all buildings): (i) to require that occupiers of multi-tenanted buildings to share goods and service suppliers (i.e. collaborative procurement), (ii) how new builds could be required to include specified levels of on-site storage (as such space has been diminishing in shops and offices for many years in London resulting in increasing frequency of small delivery quantities and hence vehicle trip generation), (iii) the requirement for suitable off-street space in new builds over given sizes for vehicles providing goods and services (to reduce the use of on-street kerbside while delivery and servicing takes place), (iv) the mandatory use of off-site consolidation facilities for certain, frequently-delivered but non-time critical goods, (v) the requirement for concierge services in multi-tenanted buildings (so that providers of goods and services do not need to penetrate deep into buildings and upstairs via lifts and staircases – all of which extends vehicle dwell times which usually takes place on-street), (vi) the use of financial charges related to exceedances of agreed goods and service vehicle trip generation rates, or conversely business rate reductions based on less-than-agreed freight vehicle trip rates at buildings.</p>
T7G	<p>Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.</p>	<p>See comments on policy T7D above.</p> <p>In order to ensure that last-mile deliveries associated with online retailing are efficient and sustainable and that 'failed' delivery rates are reduced consideration needs to be given to appropriate charging and taxation interventions in order to address the externalities arising from this freight activity (and which is likely to continue to increase at a rapid rate based on current online retailing forecasts. Action</p>

		is needed to prevent the delivery service levels offered by retailers becoming ever-faster, resulting in smaller vehicle payloads and further vehicle trip generation).
T7H	At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.	<p>Although Delivery and Servicing Plans mandated on new builds over a given size are supposed to address freight sustainability and efficiency issues, in reality at present they are typically unenforceable and subject to little, if any, monitoring. For this policy to have any impact they need greater thought in terms of how to apply to them to new builds where they are imposed on a developer and subsequent tenants can argue they did not agree to them. Plus greater resources are needed to monitor developments subject to a DSP to ensure that it is being complied with. Consideration also needs to be given to whether there are mechanisms by which DSPs could be applied to existing buildings as well as new builds.</p> <p>As mentioned in response to policy SD4M, several innovative, sustainable freight transport operations require the use of small, suitably located depots especially in inner and central London. However, at present market forces mean that such land is unaffordable to logistics operators. However, the Mayor, London boroughs and other public sector organisations have considerable land portfolios that are not needed for their current business. There is therefore scope for these public sector organisations to find ways in which suitable land can be made available at affordable prices for sustainable freight transport and logistics operations. Given the stated sustainable transport aspirations of London's Mayor and its 33 boroughs this would seem to be a good opportunity to demonstrate and support integrated land-use and freight transport planning in London. However, most of these public organisations seem more concerned with income generation and maximisation (through releasing such land for uses and developments with higher financial returns than logistics). This is leading to a fundamental mismatch between the stated sustainable freight transport objectives and targets and sufficiently strong policy actions needed to support and achieve these sustainability objectives.</p>
T7I	Development proposals must adopt appropriate construction site design standards to enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.	
<b>Policy T8</b>	<b>Aviation</b>	
T8A	The Mayor supports the case for additional aviation capacity in the south east of England providing it would meet London's passenger and freight needs,	

	recognising that this is crucial to London's continuing prosperity and to maintaining its international competitiveness and world-city status.	
<b>T8B</b>	The Mayor supports the role of London's airport in enhancing London's spatial growth, particularly within Opportunity Areas well connected to the airports by public transport and which can accommodate significant numbers of new homes and jobs.	
<b>T8C</b>	The environmental impacts of aviation must be fully acknowledged and the aviation industry should fully meet its external and environmental costs particularly in respect of noise, air quality and climate change; any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.	
<b>T8D</b>	The Mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities.	
<b>T8E</b>	All airport expansion proposals should demonstrate how public transport and other surface access networks would accommodate resulting increases in demand alongside forecast background growth; this should include credible plans by the airport for funding and delivery of the required infrastructure.	
<b>T8F</b>	Proposals that would lead to changes in airport operations or air traffic movements must take full account of their environmental impacts and the views of affected communities. Any changes to London's airspace must treat London's major airports equitably when airspace is allocated.	
<b>T8G</b>	Better use should be made of existing airport capacity, underpinned by upgraded passenger and freight facilities and improved surface access links, in particular rail.	
<b>T8H</b>	Airport operators should work closely with airlines, Transport for London and other transport providers and stakeholders to ensure straightforward, seamless and integrated connectivity and to improve facilities and inclusive access. They should also increase the proportion of journeys passengers and staff make by sustainable means such as rail, bus and cycling, and minimise the environmental impacts of airport servicing and onward freight transport.	
<b>T8I</b>	Development of general and business aviation activity should generally be supported providing this would not lead to additional environmental harm, or impact on scheduled flight operations. Any significant shift in the mix of operations using an airport - for example introduction of scheduled flights at airports not generally offering such flights - should normally be refused.	

T8J	New heliports should be refused, other than for emergency services, and steps should be taken to reduce helicopters overflying London.	
<b>Policy T9</b>	<b>Funding transport infrastructure through planning</b>	
T9A	The Mayor will charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance such as Crossrail 2, and potentially other strategic transport infrastructure.	
T9B	In consultation with the Mayor, boroughs should identify a package of other strategically-important transport infrastructure, as well as improvement to public realm, along with other funding streams to deliver them.	
T9C	Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach.	
<b>Policy DF1</b>	<b>Delivery of the Plan and Planning Obligations</b>	
DF1A	Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.	
DF1B	If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application.	
DF1C	Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.	
DF1D	When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this: <ol style="list-style-type: none"> <li>1) Recognise the role large sites can play in delivering necessary healthy and education infrastructure; and</li> </ol>	

	2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth.	
DF1E	Boroughs are also encouraged to take account of part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list.	
Policy M1	<b>Monitoring</b>	
M1A	The implementation of the London Plan will be kept under review using, in particular, the Key Performance Indicators set out in Table 12.1 and reported in the Annual Monitoring Report.	