

**M14. Are the Opportunity Areas identified on the Key Diagram and Figures 2.4 to 2.12 likely to deliver the indicative number of additional homes and jobs assumed in the Plan<sup>1</sup> in a way that is justified and consistent with national policy?**

- 14.1 Yes, Opportunity Areas (OAs) are areas with the potential to deliver a substantial amount of the new homes and jobs London needs over the medium to long-term. They are a longstanding policy designation included in previous iterations of the London Plan. Their identification ensures that local planning authorities work collaboratively with the Mayor, stakeholders and local communities to meet national policy requirements to: positively seek opportunities to meet the development needs of an area; prioritise development on brownfield land; promote sustainable travel modes; identify broad locations for growth; promote good design; and ensure strategic priorities are properly coordinated across local boundaries.<sup>2</sup> Policy GG2 A prioritises OAs as enabling the development of brownfield land.
- 14.2 Established OAs are now delivering significant numbers of new homes and jobs, as a result of consistent policy direction in the London Plan and partnership working between the Mayor, boroughs and local stakeholders. New OAs have been designated either at the request of the relevant borough or because of their link to enhanced transport improvements. Some OAs are already referenced in the current London Plan<sup>3</sup> or were identified through emerging plans for local growth.

**In particular:**

**a) Are sites likely to be available in the Opportunity Areas with sufficient capacity to accommodate the expected scale of development?**

- 14.3 Yes, the evidence indicates that, over the Plan period to 2041, the capacity exists to accommodate the scale of development set out in Chapter 2<sup>4</sup>. OAs identified in previous Plans are currently delivering significant numbers of new homes and jobs, including VNEB, Kings Cross/St Pancras and White City. As with these existing OAs, performance in new OAs should be measured over the medium to long term.
- 14.4 The indicative number of homes expected is drawn from the Strategic Housing Land Availability Assessment (SHLAA)<sup>5</sup>, which takes into account the principles of sustainable development and considers the various planning policy, environmental and delivery constraints on potential housing capacity and the demand for other land uses. Figures are derived from the large site system and estimates are for the full Plan period to 2041.
- 14.5 Infrastructure is key to enabling and supporting development and the clustering of OAs into growth corridors ensures that the most is made from transport investment

<sup>2</sup> NLP/GD/03: DCLG, [National Planning Policy Framework](#), March 2012, Paragraphs 14, 17, 35, 47, 58, 111.

<sup>3</sup> Annex 1 of the 2016 London Plan identified Kingston, Haringey Heartlands, Sutton Hospital, and the Great West Corridor as potential new OAs

<sup>4</sup> It is important to distinguish the OA figures, which are for the period up to 2041, from the 10-year housing targets in Policy H1. A useful example is OPDC: the OA indicative figure for new homes to 2041 is 25,500, and the 10-year target in Policy H1 is 13,670.

<sup>5</sup> NLP/HOU/002: Mayor of London, Strategic Housing Land Availability Assessment, November 2017

and helps enable the proper planning of utilities, communication capacity and social infrastructure. There is strong evidence that the provision of new and/or improved transport infrastructure promotes development in new growth locations and supports increased capacity in existing OAs<sup>6</sup>. In light of this experience, higher density assumptions were applied to allocated and potential housing sites in OAs when assessing sites in the SHLAA<sup>7</sup>; these estimates were discussed with the boroughs as part of the SHLAA process. The most recent LDD<sup>8</sup> data shows that 40 per cent of the total OA housing capacity has either started or has planning approval. Of the remaining 60 per cent, over half is already allocated in plans and OAPFs<sup>9</sup>. The remaining capacity represents unallocated, long-term capacity to 2041. Greater certainty on this capacity will be provided through the preparation of planning frameworks where more detailed capacity assessments are undertaken. Section 4.41 to 4.47 of the SHLAA provides further detail on housing capacity in the OAs.

- 14.6 OA jobs figures are drawn from either the London Employment Sites Database (LESD)<sup>10</sup>, or, where this was not available, the most recent development plan document. The LESD is considered a thorough and robust assessment, with each borough having been consulted on the draft document. It uses a range of robust data sources<sup>11</sup>, and the use of the SHLAA and LESD in deriving the homes and jobs figures set out in Table 2.1 helps ensure the figures are based on deliverable land capacity. Delivery of this capacity will, in a number of OAs, be dependent upon the timely provision of infrastructure and improved public transport provision. The first phase in preparing new OAPFs – the development capacity study – will test the indicative figures provided in the draft Plan, particularly the phasing assumptions and the estimates for the longer term ‘potential sites’ (i.e. those without an existing allocation or approval). The methodology includes assumptions around the provision of infrastructure, such as schools and health facilities and the implications for density of public transport improvements and assesses employment as well as housing capacity.

**b) Have the Opportunity Areas been chosen having due regard to flood risk in accordance with national policy?**

- 14.7 A Regional Flood Risk Appraisal (RFRA)<sup>12</sup> has been carried out to inform the Strategic Flood Risk Assessments (SFRAs) that local planning authorities have to produce to inform their Local Plans.<sup>13</sup> The RFRA includes an assessment of all OAs<sup>14</sup>, which identified that all OAs face some form of flood risk (see table following Map 2 of the RFRA). As advised by the Environment Agency (EA) and given the significant levels of growth planned for these areas, the assessment of the OAs took a precautionary approach by also covering less likely 1 in 1000 year events. Table 1 of the RFRA provides broad OA-specific information on flood risk characteristics and potential

<sup>6</sup> For example, the NLE has unlocked significant growth at Nine Elms, and growth in Woolwich has been initiated by the extension of the DLR, and the forthcoming Elizabeth Line

<sup>7</sup> NLP/HOU/002: Mayor of London, Strategic Housing Land Availability Assessment, November 2017, Section 2.34

<sup>8</sup> London Development Database

<sup>9</sup> Opportunity Area Planning Framework

<sup>10</sup> NLP/EC/002a: CAG Consultants, London Employment Sites Database, May 2017, Section 5.2 and Table 5.4

<sup>11</sup> Including: LDD pipeline of approvals for non-residential floorspace, Local Plan site allocations, DIF studies NLUD, Other sites put forward by boroughs (aspirational sites), Other secondary data sources, such as property press publications like Property Week and CoStar

<sup>12</sup> NLP/SI/026: Mayor of London, Regional Flood Risk Appraisal, September 2018

<sup>13</sup> NLP/GD/03: DCLG, [National Planning Policy Framework](#), March 2012, Paragraph 100

<sup>14</sup> NLP/SI/026: Mayor of London, Regional Flood Risk Appraisal, September 2018, Table 1

mitigation measure, which should be taken into account for more detailed local investigations when preparing planning frameworks in consultation with the EA. If necessary, relevant policies should be included as part of the framework. As highlighted in the RFRA, *'appropriate development can still come forward and may actually result in a reduction of flood risk both on site and for surrounding areas'*.<sup>15</sup>

14.8 The Mayor has proposed a minor suggested change (MSC)<sup>16</sup> that better reflects the outcome of the RFRA. Policy SI5 Clause EA requires the production of Integrated Water Management Strategies in growth areas, such as OAs, where there are flood risk constraints or insufficient water infrastructure capacity. Policies SI12 and SI13 deal with planning for flood risk and drainage comprehensively, and also apply in OAs.

14.9 In preparing the SHLAA, site assessments were informed using flood risk as one of the environmental constraints.<sup>17</sup> The RFRA also explains how flood risk considerations were addressed within the SHLAA.<sup>18</sup> The London boroughs are specifically encouraged to review any housing probability reductions based on knowledge from their local SFRA.

**c) To be effective in preventing unacceptable risk from pollution and land instability and ensuring that development only takes place on sites that are suitable for the use proposed, is it necessary for the Plan to set out a strategic approach to dealing with despoiled, degraded, derelict, contaminated and unstable land in Opportunity Areas?**

14.10 No, this is most appropriately set out in local plans and OAPFs. The Environment Agency is consulted during the preparation of planning frameworks and has recommended policies to deal with the risk of such land.<sup>19</sup>

14.11 There are also other regulatory regimes that deal with contaminated land.<sup>20</sup> The main role of the planning system is to ensure a site is suitable for its new use and prevent unacceptable risk from pollution. As this is something that is site specific and the 2012 and 2018 NPPFs set out a clear approach to the remediation of contaminated and unstable land for local plans and planning decisions, it is not considered necessary for the London Plan to repeat this.

14.12 There are also other policies in the draft London Plan under which contaminated land and associated issues are considered, and which would apply within OAs.<sup>21</sup>

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<sup>15</sup> NLP/SI/026: Mayor of London, Regional Flood Risk Appraisal, September 2018, Paragraph 141

<sup>16</sup> NLP/CD/09: GLA, [Table of Changes - Minor Suggested Changes to the Draft new London Plan](#), September 2018, Ref MSC.9.57

<sup>17</sup> NLP/HOU/002: Mayor of London, Strategic Housing Land Availability Assessment, November 2017, Paragraphs 2.66 -2.70

<sup>18</sup> NLP/SI/026: Mayor of London, Regional Flood Risk Assessment, September 2018, Paragraphs 19-23

<sup>19</sup> For example, Section 2.2 of the London Riverside OAPF, and Policy EU3 of the OPDC Local Plan.

<sup>20</sup> For example, the Environmental Protection Act 1990

<sup>21</sup> Policy D9 in relation to basements; Policy E7 in relation to residential elements of industrial intensification and co-location and Policy G8 in relation to food growing. In addition, contaminated land will be considered through the Health Impact Assessment process identified as part of Policy GG3. Finally, Policy SI7 sets out the requirement for Circular Economy Statement to set out how remediated materials will be re-used or recycled.

**d) How would the development proposed be likely to affect the character and appearance of existing places within the Opportunity Areas including with regard to heritage assets and their settings?**

- 14.13 OAs are identified as areas with significant capacity to deliver new homes and jobs. Large scale development will inevitably have implications for the character and appearance of the existing places. However, as recognised by the Plan, respecting character and accommodating change are not mutually exclusive. The development of OAPFs will be informed by an understanding of a place's distinctive character, in terms of physical form, but also including a thorough understanding of the demographics of communities and their needs in line with Policy SD10.
- 14.14 Character and heritage is considered as part of understanding the development capacity of an OA<sup>22</sup>. Future OAs will be driven by Policies D1 and D2, which provide the framework for delivering Good Growth through good design<sup>23</sup>, and HC1 which sets out how London's historic environment and heritage assets will be managed and effectively integrated in regenerative change. The Mayor has proposed a MSC to clarify the approach in OAs: additional text to SD1B, recognising the role of heritage in place-making, and additional text at paragraph 2.1.3 to ensure plans include an understanding of the existing character and context of an area when considering growth<sup>24</sup>.

**e) Is the necessary transport and other physical, environmental and social infrastructure likely to be in place in each of the Opportunity Areas in a timely manner?**

- 14.15 Yes, the development capacity of the OAs has been identified for the medium to long term to 2041, linked to the future provision of infrastructure. The capacity assessments for OAs are based on an understanding of the infrastructure needed to support/enable the development. Different OAs are at different stages in the development process: some are well advanced with the necessary infrastructure either being built or completed, while others cannot come forward until the relevant infrastructure is provided. Policy SD1 B3 ensures that boroughs, in preparing plans, consider the necessary social and other infrastructure to sustain growth, and this approach applies to OAPFs.
- 14.16 Policy T2 D lists schemes that are critical to unlocking a number of OAs, and which also form the basis for a number of growth corridors. Table 10.1 provides a fuller list of schemes that will support individual OAs. The Mayor's Transport and Housing strategies provide further detail on how he will invest in infrastructure to unlock growth and development.
- 14.17 As a recent example, the draft Isle of Dogs OAPF sets out details of the infrastructure that will be required to support each of the development options. This is informed by an infrastructure study<sup>25</sup>, and such studies are a key mechanism for identifying the infrastructure required to support OA growth.

<sup>22</sup> See draft Isle of Dogs and South Poplar OAPF (GLA May 2018) Chapter 5 for an example of the approach taken

<sup>23</sup> This is discussed in more detail in the Mayor's response to Matter 34

<sup>24</sup> NLP/CD/09: GLA, [Table of Changes - Minor Suggested Changes to the Draft new London Plan](#), September 2018, Ref MSC 2.4 and 2.7

- 14.18 Where development proposals are emerging, and transport investment is not yet fully secured, delivery of the long-term capacity will need to be phased in a way that maximises the benefits from major infrastructure and services investment, whilst avoiding any unacceptable effects on existing infrastructure before the new infrastructure is available. The GLA and TfL will work with boroughs to agree the capacity of areas for each phase, and Grampian conditions may be used to ensure transport capacity is available before development can go ahead.<sup>26</sup>
- 14.19 The GLA published the London Infrastructure Plan<sup>27</sup> in 2014 and London’s Strategic Infrastructure Requirements in 2017<sup>28</sup>. The latter specifically considered the potential for growth in OAs, as clustered in growth corridors, in determining the list of infrastructure needs. It identified ‘Growth drivers’ – the primary pieces of infrastructure necessary to facilitate housing and commercial delivery – and ‘Growth enablers’ – projects without which housing and commercial delivery would not be viable. The Mayor has established an Infrastructure High Level Group to improve infrastructure planning, maintenance and construction. To support this group, the GLA is developing a web tool, the London Infrastructure Mapping Application, which visualises future investment in infrastructure and development, along with capacity and context information, to encourage coordination and improved planning for growth.
- 14.20 The Mayor is currently setting up an Infrastructure and Development Coordination Team that will provide a range of services across London, focused on facilitating the coordination of infrastructure and development planning and delivery. It is initially looking at pilots in three OAs.<sup>29</sup>
- f) Would the development proposed in the Opportunity Areas support policy GG1 “building strong and inclusive communities” and Policy SD10 “strategic and local regeneration”?**
- 14.21 Yes. in preparing and implementing local plans and OAPFs, LPAs and the Mayor should ensure that OAs support wider regeneration – delivering benefits to existing and new communities, including access to jobs and services, and integrating development proposals to surrounding areas, especially the Areas for Regeneration. This will start with a thorough understanding of the demographics of local communities and their needs, with a particular focus on any Areas for Regeneration. The active planning and promotion of OAs provides an opportunity for new investment in affordable housing and workspace and in new community facilities.
- 14.22 The process of OAPF preparation includes public consultation, which can ensure fuller engagement with existing local communities about specific proposals and how these can be delivered.

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<sup>26</sup> The Mayor has recently agreed with Southwark a phasing plan for development in the Old Kent Road, setting a limit on how much can come forward in advance of the commencement of work on the BLE. At Barking Riverside development is capped until public transport access is improved.

<sup>27</sup> NLP/EC/20: Mayor of London, London Infrastructure Plan 2050, July 2014

<sup>28</sup> NLP/SI/001: ARUP, London’s strategic infrastructure requirements – an evidence base to help deliver the Mayoral Strategies, 2017

<sup>29</sup> Isle of Dogs, Royal Docks, Croydon Growth Zone

14.23 Policy SD1 provides a clearer framework for OAs than previous Plans by ensuring the aims of Policy GG1 are reflected in Policies SD1 A5, and A6. The Mayor has proposed a MSC<sup>30</sup> to Policy SD1 B3 to reinforce this aim and provide further clarity on the importance of mixed and inclusive communities in planning for OAs. Policy SD1 A6 complements Policy SD10 by ensuring that Areas of Regeneration are specifically considered in the preparation, consultation and implementation of OAPFs.

**g) Would Policy SD1 provide an effective strategic context for the preparation of local plans and neighbourhood plans?**

14.24 Yes, Policy SD1 provides strategic guidance on the key principles for enabling Good Growth in the OAs. It sets out an over-arching framework for the development of more detailed policy guidance at the local level.

14.25 It provides an effective strategic framework for boroughs to use their local plans and OAPFs to set out how they will deliver the potential for growth, create employment and housing choice for Londoners, plan for the necessary infrastructure, establish capacity for growth using good design, support industrial capacity, support sustainable transport and regeneration, and involve the local community. It also seeks to provide sufficient certainty for the local community, developers and other stakeholders on how Good Growth will be delivered in the OAs. The policy supports effective joint working between the GLA and London boroughs. The Mayor also promotes OAs through his other statutory strategies, which specifically support the development potential of OAs.<sup>31</sup>

**h) Is the approach to development management set out in SD1 consistent with national policy and would it be effective particularly in terms of the role of “planning frameworks”?**

14.26 Yes, OAPFs are an established part of the planning policy environment in London, and have been used by decision-makers to guide and manage development for many years. They are designed to complement the process of local and neighbourhood plan formulation, rather than replace local policy. They play a key role, bringing together a range of partners to realise the potential of London’s most significant development opportunities. OAPFs provide a strategic framework for development within each OA, articulating policy directions established in the London Plan and borough local plans. They also focus on matters of implementation and provide a strategic assessment of the opportunities and challenges of each area. For example, the recently-published Isle of Dogs and South Poplar draft OAPF includes sections on land use strategy, infrastructure provision (such as transport, social and utilities), urban design, and delivery and monitoring. It was prepared in partnership with, and alongside, the Tower Hamlets Local Plan.

14.27 There are various approaches to producing OAPFs, including through the use of Supplementary Planning Guidance (SPG), borough SPD, Area Action Plans or

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<sup>30</sup> NLP/CD/09: GLA, [Table of Changes - Minor Suggested Changes to the Draft new London Plan](#), September 2018, Ref MSC 2.2 and 2.3

<sup>31</sup> For example, pages 162, 325 and 362 of the Environment Strategy; Chapter 5 of the Mayors Transport Strategy; Chapter 3 of the Housing Strategy; and the Thames Estuary Production Corridor

masterplans.<sup>32</sup> OAPFs can be produced and consulted upon relatively quickly. As such, they provide a valuable and streamlined mechanism to help co-ordinate the investment decisions of partners and inform the more detailed expression of policies and land use allocations of local and neighbourhood plans, where these are in preparation. OAs are specifically supported in the Mayor's Housing, Transport and Environment strategies.

- 14.28 The process of producing OAPFs ensures regular communication between the GLA Group, boroughs and other key stakeholders. Consultation with, and feedback from, the public, business and other interested parties is integral to the preparation of frameworks. Once formally adopted by the Mayor, they have weight in decisions as a material consideration.

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<sup>32</sup> Examples of published OAPFs include London Riverside, Upper Lea Valley, and Isle of Dogs and South Poplar. Examples of borough OAPFs include the Old Kent Road AAP, Charlton Riverside SPD and Great West Corridor Local Plan review

## **Appendix 1 – Further Suggested changes**

In response to comments from Merton Council, the Mayor is suggesting a further change to Chapter 2:

- Wimbledon OA – Renamed Wimbledon/South Wimbledon/Colliers Wood  
Reason – to match reference on key diagram
- Wimbledon OA – add reference in text to the potential for development at Morden Town Centre  
Reason – to reflect development opportunity in OA area