

The London Plan

Examination in Public 2018-2019

**Mayor's responses to the Panel's
Preliminary Questions**

September 2018

PQ1. Does the Plan deal only with matters which are of strategic importance to Greater London¹? Please provide a schedule of all policies in the Plan explaining briefly why each of them deals with matters of strategic importance.

1. Yes, the Plan deals only with matters which are of strategic importance to Greater London².

Policy	Why each Policy deals with matters of strategic importance
Chapter 1 Planning London's Future (Good Growth Policies)	The six Good Growth Policies in the London Plan set the overall strategic objectives for the London Plan. All Good Growth policies cover issues that permeate the Plan and ensures that all planning decisions are taken with the delivery of these policies in mind. All of the policies in the Plan contribute to the delivery of the Good Growth policies.
Chapter 2 Spatial Development Patterns	
Policy SD1 Opportunity Areas	OAs are a longstanding strategic policy designation. The policy guides development in broad locations with the development capacity to accommodate housing and commercial development of strategically significant scale. They are often linked to planned or potential significant improvements in public transport capacity and connectivity. They also assist in co-operation between boroughs as many OAs cross borough boundaries.
Policy SD2 Collaboration in the Wider South East	Strategically important matters such as economic and housing growth, transport and environmental infrastructure benefit from policy and evidence coordination across a wider than just cross-boundary geography, and planning in London cannot ignore its inextricable links with authorities outside London in terms of migration flows, commuter flows, the flow of natural resources, business and environmental links etc.
Policy SD3 Growth locations in the Wider South East and beyond	Economic and housing markets within and beyond London's boundaries are inextricably linked. Growth prospects need to be set in a wider inter-regional context recognising that London is not 'an island'.

¹ Section 334(5) of the Greater London Authority Act 1999 ("GLA Act").

² Section 334(5) and (6) of the Greater London Authority Act 1999 ("GLA Act").

Policy SD4 The Central Activities Zone (CAZ)	The CAZ is the vibrant heart and globally-iconic core of London. It is one of the world’s most attractive and competitive business locations. It accommodates one third of London’s jobs and generates almost 10 per cent of the UK’s output. It contains the seat of national Government and is internationally renowned for its culture, night-time economy, tourism, shopping and heritage. At the local level, planning for the CAZ is split between ten London boroughs that each contain a part of the Zone. Policy SD4 provides the strategic planning framework for more detailed CAZ policies at the Local Plan level.
Policy SD5 Offices, other strategic functions and residential development in the CAZ	The CAZ and Isle of Dogs North support a nationally and internationally significant scale and agglomeration of offices (as recognised by national government through the exemption given to this area for office to residential permitted development). They also contain other strategically important activities including functions associated with the State, Government and Monarchy, higher and further education, law, medicine, arts, culture, entertainment, retailing and tourism. Policy SD5 provides strategic policy principles to maintain an appropriate balance between offices, other strategic functions and new residential development in different parts of the CAZ. This provides a spatial framework for more detailed Local Plan policies for specific parts of the Zone which, as noted in SD4 above, is split across ten boroughs.
Policy SD6 Town centres	London’s town centres play a crucial role in supporting the economic success of London as a whole and provide a spatial framework for access to goods and services for Londoners and those working in and visiting the city. Many town centres – particularly larger centres – serve a catchment area that stretches across borough boundaries and in some cases, they have a regional or international catchment.
Policy SD7 Town centre network	The town centres in London together form a network of centres of different types, sizes and catchments that serve different areas, functions, communities and customers. This network stretches across London, and changes to the network in one area can affect centres elsewhere, often across borough boundaries. Planning for the town centre network and classifying town centres within a hierarchy (set out in Annex 1 of the Plan) has been a consistent feature throughout all London Plans, and this consistent approach provides certainty for commercial investment decisions.

<p>Policy SD8 Town centres: development principles and Development Plan Documents</p>	<p>This policy sets out development principles regarding the planning for town centre uses. Ensuring that town centre uses are focussed in town centres supports the vitality and viability of town centres, which play a crucial role in London’s economy. Town centres provide significant opportunities for a broad range of growth to meet London’s strategic needs for housing, social infrastructure and commercial development; Part B of the policy gives a consistent framework for boroughs when drawing up policies for town centres, and Part C of the policy gives broad principles for development proposals in town centres. This will assist in supporting the strategic role of town centres as locations for economic growth and will promote social development in London.</p>
<p>Policy SD9 Town centres: Local partnerships and implementation</p>	<p>Supporting the vitality and viability of London’s town centres is crucial in sustaining economic growth across London. Given the diverse range of stakeholders that have an interest in town centres it is important that partnership approaches are taken, and town centre strategies can assist particularly in providing a clear, shared vision for town centres, encouraging investment and guiding development and regeneration. The policy also encourages boroughs to introduce targeted Article 4 Directions in town centre locations, as well as supporting land assembly and a range of mechanisms to deliver growth and investment in town centres; these will all contribute to supporting the strategic role of town centres in London’s economy and as locations for growth.</p>
<p>Policy SD10 Strategic and local regeneration</p>	<p>This policy recognises the spatial inequalities across London and highlights those parts of London that fall within the 20 per cent most deprived areas in England. Identifying these areas as strategic areas for regeneration ensures that regeneration initiatives are directed toward those parts of London that are most in need. This is an important aspect of promoting social development in London as per the Mayor’s duties under the GLA Act.</p>
<p>Chapter 3 Design</p>	

<p>Policy D1 London’s form and characteristics and Policy D2 Delivering good design</p>	<p>The design focused policies in Chapter 3 work together to ensure good design outcomes for all forms of development. This provides a strategic approach to the design of development across London to ensure London develops sustainably. Good design outcomes are particularly important given the step change in housing delivery from 42,000 homes pa in the current London Plan to 65,000 homes pa set out in the draft London Plan.</p> <p>Having detailed design policies that are able to be clearly interpreted and implemented consistently at the local level is essential for ensuring that the new housing target is able to be achieved through sustainable ‘good’ growth with positive development outcomes in terms of design and other amenity issues.</p> <p>The policies flow from D1 “London’s form and characteristics” which sets out the required characterises that new development should create, to Policy D2 which sets out the processes which boroughs and developers need to follow to ensure good design and deliver the characteristics set out in Policy D1.</p> <p>The other policies in the chapter provide the detail on specific design issues that affect development across London; a strategic policy approach is necessary to ensure consistency in the approach to the resolution of these issues across greater London.</p>
<p>Policy D3 Inclusive design</p>	<p>This policy seeks to ensure that development is designed to be inclusive and provide for all Londoners, a key aspect of promoting social development in London. Having a consistent approach to inclusive design across London is particularly important for disabled and older people, in order to ensure there are not areas from which they are excluded and to increase their independence and participation in the life of the city. While individual boroughs will have different demographic profiles, the needs of disabled and older Londoners do not vary significantly across London, and all areas of London should be suitable for disabled and older people – whether residents or visitors.</p>
<p>Policy D4 Housing quality and standards</p>	<p>Significantly more homes must be delivered to meet Londoners’ housing needs. This will require higher density development and - given the pressure for development - ensuring these homes are of good quality and fit for purpose is a strategically important issue. Housing standards are one of the most effective tools in ensuring the quality and sustainability of new housing, and this approach gives consistency and certainty to developers.</p>

Policy D5 Accessible housing	Without this approach there could be significant variation between boroughs in the provision of accessible housing, leading to a lack of suitable choice for all Londoners, particularly disabled people. This could limit the opportunities for many Londoners to lead dignified and independent lives and would mean some parts of London are not helping to address the needs of those who require accessible housing or the demographic change of increased life-expectancy. This policy will help to promote social development in London as per the Mayor's duties under the GLA Act.
Policy D6 Optimising density	Given the acute pressure in London for a range of land uses, ensuring all land is used as efficiently as possible is strategically important. The policy helps ensure that the density of development across London is appropriate for its locations and that there is sufficient supporting infrastructure to ensure it will be sustainable.
Policy D7 Public realm	The quality and design of London's public realm is a strategic concern for a number of reasons. The public realm includes the network of roads, pavements and squares that enable people to move around the city, it crosses borough boundaries and via Transport for London the Mayor is responsible for the management and maintained of much of this network. The quality, design, accessibility and location of the public realm plays an important role the concept of 'good growth' as it encourages people to use more sustainable forms of travel (e.g. walking and cycling) that improve people's health and reduces pollution from vehicle traffic. With the level of growth being proposed in the London Plan, the delivery of well-designed public spaces will be important in ensuring that growth is sustainable and provides a quality of life.
Policy D8 Tall buildings	The location of Tall Buildings is a strategically important matter having an impact on views and heritage assets across borough boundaries, the requirements for and provision of transport infrastructure, and the legibility of the city. Many tall buildings also have a strategic function, whether providing significant quantities of new housing in opportunity areas and town centres or providing strategically important quantities of office floorspace in the CAZ.
Policy D9 Basement development	The development of large-scale basements can have significant cumulative impacts, particularly in relation to impacts on the underground tube network which is strategically managed across London. The number and location of these developments has increased and spread across parts of London recently and this policy ensures boroughs seek to address these issues in a way that is appropriate to their local circumstances.

Policy D10 Safety, security and resilience to emergency	Planning strategically for safety and security is important to ensure that all parts of London are contributing to the resilience of the capital. This also involves London-wide organisations such as the Metropolitan Police Service and the London Fire commissioner for which the Mayor has statutory responsibility.
Policy D11 Fire safety	Safety of residents and those working in and visiting London is strategically important to ensuring a safe and resilient city and must be of paramount concern when developing new buildings. The Fire safety policy has been introduced due to significant concerns as to the scope and effectiveness of the Building Regulations and the associated Approved Documents. Moreover, in order to tackle the housing crisis, it is imperative that all Londoners have confidence in high-density living.
Policy D12 Agent of Change	Meeting London's development needs and making the most efficient use of land necessitates new development to be located next to existing land uses, which may generate noise or other nuisances in their normal operations (and vice versa). Many uses - such as cultural venues, pubs, industrial sites and transport infrastructure - play a vital role in London's economy and its global success, and in the social development of London. Thus, a strategic approach is required to ensure new and old land uses can co-exist sustainably.
Policy D13 Noise	The high level of development that is planned for to meet London's needs requires a strategic approach to the management of noise to ensure its adverse impacts are avoided or mitigated in all development to promote a good quality of life and health for Londoner's wherever in the city they are.
Chapter 4 Housing	
Policy H1 Increasing housing supply and H2	Delivering the homes Londoners need is of strategic importance to London as it is a key aspect of delivering the Good Growth policies. London's dynamic housing market crosses administrative boundaries within London and therefore London is treated as a single housing market. Planning for the right number of homes in the right places, while ensuring other land uses are protected where necessary, can only effectively be done at the London wide level. A specific policy on small sites is required as these sites comprise a significant proportion of London's potential housing capacity. A strategic approach is required to realise this potential.
Policy H3 Monitoring housing targets	The GLA is uniquely placed to monitor progress against strategic policies.

Policy H4 Meanwhile use	Meanwhile housing can accelerate housing delivery rates because it enables the rapid provision of housing on land awaiting long-term redevelopment. Given the scale of London’s housing need, ensuring all potential sources of housing supply are considered is of strategic importance.
Policy H5 Delivering affordable housing, Policy H6 Threshold approach to applications and Policy 7 Affordable housing tenure	<p>Providing the affordable housing that London needs is critical to enabling London to maintain the function and resilience of the city and to delivering Good Growth.</p> <p>The threshold approach is a key tool to deliver the affordable homes London needs and to accelerate the planning and delivery of viable schemes. The approach provides development certainty, speeds up the planning and delivery of homes and ensures that developers are incentivised to provide more affordable housing.</p> <p>Ensuring that homes are genuinely affordable is also crucial in meeting need and delivering mixed and inclusive communities. Policy H7 ensures that a range of affordable housing products are delivered to meet the housing needs of eligible households on a range of incomes. Boroughs have flexibility over the affordable housing tenure of 40% affordable homes secured in-borough to ensure that affordable housing contributions strike a balance between meeting London’s strategic affordable housing needs and local affordable housing needs.</p>
Policy H8 Monitoring of affordable housing	The GLA is uniquely placed to monitor progress against strategic policies.
Policy H9 Vacant building credit	Ensuring the planning system can deliver affordable housing is an important strategic matter to meeting London's identified housing need. Most of London's future housing opportunities are on sites which include existing buildings. The application of the VBC could unnecessarily reduce affordable housing contributions on a large number of sites and reduce London's ability to meet its affordable housing needs.
Policy H10 Redevelopment of existing housing and estate regeneration	Due to London’s acute need for affordable housing, ensuring development is not permitted which results in a loss of affordable housing is of strategic importance to delivering the homes Londoners need.
Policy H11 Ensuring the best use of stock	Given the pressure for housing it is strategically important to ensure existing stock is used effectively to meet housing needs.

Policy H12 Housing size mix	As demonstrated by the SHMA, London’s housing market spans administrative boundaries due to high levels of migration within, into and out of London. The policy seeks to ensure that the homes that Londoners need are delivered by ensuring that a range of criteria is considered when assessing the suitable housing size mix for a site, taking into account the specifics of the site as well as local and strategic housing need. The Policy also requires boroughs to provide guidance on the type of low cost rented homes required to ensure identified need is being met.
Policy H13 Build to Rent	Build to Rent developments can make a significant contribution to increasing housing supply and are beneficial in a number of ways including attracting investment to London’s housing market and accelerating delivery on individual sites. Diversifying sources of housing supply is a strategically important issue as it can help increase overall housing supply and meet Londoners' housing needs. A consistent approach will help enable more Build to Rent developments to come forward.
Policy H14 Supported and specialised accommodation	Supported and specialised accommodation plays a crucial role in meeting the housing needs of Londoners and helps to tackle strategically significant issues such as homelessness and mental and physical health. Supported and specialised accommodation is often best provided on a cross or combined borough basis depending on the type of accommodation- highlighting the need for a strategic approach.
Policy H15 Specialist older persons housing	London's older population is increasing, and it is important that all parts of London play their part in meeting the need for specialist older persons housing. This policy ensures a consistent approach throughout London so that all new developments satisfy the same standards, and that older people wanting to move into specialist accommodation have the same choice and chance of accessing accessible and affordable properties than those accessing non-age restricted housing.
Policy H16 Gypsy and Traveller accommodation	Meeting Londoners’ range of housing needs is a matter of strategic importance, and this includes the needs of Gypsies and Travellers.
Policy H17 Purpose-built student accommodation	London's higher education providers play an important role in growing a good economy but are distributed unevenly across London. Identifying the need for new PBSA to support these providers is a strategic issue as the need can more effectively be met by PBSA being developed across London and not only in the borough the HEP is located. There is also a need to ensure the PBSA development provides accommodation that meets the specific housing need it intended to address in terms of occupation and cost.

Policy H18 Large-scale purpose-built shared living	Ensuring that emerging housing products can meet the needs of Londoners is a matter of strategic importance. The policy is required to manage a relatively new type of non-self-contained accommodation to ensure it provides a high-quality residential offer and contributes towards affordable housing. Due to the newness of this type of development many boroughs do not have adopted or emerging policies suitable to assess applications for this type of development. The London Plan policy is required to ensure a consistent approach and to enable boroughs to effectively manage this type of development in the event they are required to assess an application.
Chapter 5 Social Infrastructure	
Policy S1 Developing London's social infrastructure	Ensuring that all Londoners have access to social infrastructure services that maintain and improve the standard of living and quality of life of London's current and future population is strategically important in developing strong and inclusive communities and promotes social development in London. Due to the high-density nature of London, borough boundaries are often not reflective of how communities within London see themselves. As such, a strategically consistent approach to planning for social infrastructure is needed. This approach is particularly important, in areas of strategically significant growth, such as Opportunity Areas that play a vital role in ensuring that the growth of the city is sustainable and that there is broad support for new development to meet London's need.
Policy S2 Health and social care facilities	Ensuring that all Londoners have access to high quality healthcare services is of strategic importance in ensuring the health and wellbeing of communities and tackling health inequalities. Often health facilities such as hospitals serve large catchment areas across more than one borough, and planning for healthcare provision in areas of significant growth such as Opportunity Areas is a crucial aspect of the supporting infrastructure needed to support London's growing population.
Policy S3 Education and childcare facilities	Access to high quality education and training is strategically important to ensure London's current and future populations are given the best opportunities to help combat inequalities and improve social mobility across London. S3 provides a strategic framework to help tackle educational disadvantage by requiring boroughs to recognise and address needs and shortages in supply locally, sub-regionally and across borough boundaries, identify sites for future provision in their plan making and support the incorporation and location of facilities in decision making to meet identified need.

Policy S4 Play and informal recreation	Ensuring the provision of safe and stimulating play and recreation facilities is of strategic importance in ensuring the well-being, health and development of London's future generations and supporting the development of areas of strategically significant growth, such as Opportunity Areas.
Policy S5 Sports and recreation facilities	Sports and recreation facilities are important in encouraging physical activity and providing a range of social, health and wellbeing benefits to communities across London. Strategically London is experiencing increased pressure from population growth and housing demands which places pressure on the ability to provide new facilities that often require larger sites, for example playing pitches.
Policy S6 Public toilets	Public toilets are a vital facility for all Londoners, and the many people who visit the city. They are particularly important for specific groups, and the design of toilets and the provision of particular types of facilities are important in giving all Londoners the confidence to move around the city and build strong and inclusive communities. Requiring public toilets in large-scale developments will ensure that there is a broad provision across London of well-designed and fit-for-purpose public toilets, and provide a logical, usable network of specialist facilities.
Policy S7 Burial space	The provision of burial space is not evenly spread across London boroughs, and there are acute problems of capacity for accommodating further internments in many inner London boroughs in particular. There are also specific faith communities for whom burial is the only option, and for whom re-use of grave space is not acceptable, and members of these faith groups are also not evenly distributed across London boroughs. It is therefore important that a strategic approach is taken to planning for burial space, with cross-borough working to identify and address the requirements for burial space in London.
Chapter 6 Economy	
Policy E1 Offices	London contains a diverse range of office markets and clusters, including the nationally and internationally significant office locations of the CAZ, Isle of Dogs North, Tech City and Kensington & Chelsea; strategically significant office clusters in town centres and urban business parks; and more locally-oriented office provision, mostly in smaller town centres across the whole of the capital. Policy E1 provides the strategic policy framework for London's diverse office locations and associated spatial policy guidelines for individual centres are provided in Annex 1 Town Centre Network.

Policy E2 Low-cost business space	Smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. This is a strategic issue for the whole of the capital where the cost of workspace is particularly high relative to other parts of the UK. Policy E2 provides strategic policy on lower cost (open market) workspace for application in development management and to guide Local Plan preparation.
Policy E3 Affordable workspace	As noted under Policy E2, smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. This is a strategic issue for the whole of the capital where the cost of workspace is particularly high relative to other parts of the UK. Policy E3 provides strategic policy on affordable workspace (that is secured at rents maintained below the market rate) for application in development management and to guide Local Plan preparation.
Policy E4 Land for industry, logistics and services to support London's economic function	London depends on a wide range of industrial and related uses that are essential to the function of its economy and for servicing the needs of its growing population, as well as contributing towards employment. Policy E4 provides the strategic framework to manage London's industrial capacity and provides spatial guidance to boroughs on the approach to manage this capacity in light of strategic evidence on supply and demand.
Policy E5 Strategic Industrial Locations (SIL)	Strategic Industrial Locations are the largest concentrations of industrial capacity in London and account for around a half of London's total supply. They provide capacity for a range of industrial functions and particularly those that cannot be mixed with residential development and which provide essential support to the functioning of the wider London economy. The broad locations of London's SILs are identified in the London Plan and the boroughs are responsible for defining SIL boundaries in Local Plans. Policy E5 provides strategic policy on SILs so that a consistent, pan-London approach is taken to the management of these important industrial locations.
Policy E6 Locally Significant Industrial Sites	Locally significant industrial sites provide a strategically important contribution to London's industrial capacity and complement the SILs. Policy E6 provides the strategic framework for boroughs to designate and define these areas in their Local Plans.

<p>Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function</p>	<p>Policy E7 outlines a new strategic policy approach to encourage the intensification of industrial land and floorspace to make better use of land and to improve the effectiveness of industrial areas. In some cases, this could also free up land for housing and other uses. E7 also sets out the strategic approach to the co-location of industrial activity with residential and other uses in appropriate locations. Finally, E7 recognises London's strategic interrelationships with areas outside of the capital which form part of wider industrial property markets that straddle the London boundary.</p>
<p>Policy E8 Sector growth opportunities and clusters</p>	<p>The Mayor's Economic Development Strategy identifies those sectors where there are specific opportunities to support London's on-going economic success; this policy reflects the EDS and sets out the spatial requirements for enabling growth across a variety of sectors and within specific clusters of activity. Many of these sectors and clusters will operate across multiple boroughs.</p>
<p>Policy E9 Retail, markets and hot food takeaways</p>	<p>Ensuring a successful retail sector, and ensuring all Londoners are well served with good access to shops and markets that serve their needs, are important for growing a good economy and the sustainable growth of London as a whole.</p> <p>The policy also addresses proposals for hot food takeaways. The lack of hot food takeaway planning policies in some boroughs has a negative impact on health inequalities across London, particularly since more deprived local authorities have a higher density of fast food outlets. The health of Londoners is a key aspect of promoting social development in London which the Mayor has responsibility as part of his duties under the GLA Act.</p>
<p>Policy E10 Visitor infrastructure</p>	<p>London is the second most visited city in the world, and its visitor infrastructure is vital in supporting the tourism sector and promoting the economic and cultural success of the city as a whole. The provision of visitor infrastructure, particularly the supply of serviced accommodation, should be planned taking into account the strategic need for these uses in London, especially within the CAZ which includes part or all of 10 London boroughs.</p>

Policy E11 Skills and opportunities for all	It is important that opportunities for skills development are co-ordinated strategically at the London level as well as locally. Training and apprenticeship opportunities – particularly those within the construction sector – are location-sensitive and may relocate prior to apprentices completing their training. It is therefore important that training opportunities are not limited only to those within a borough, and that there is a more uniform approach across London than has previously been the case.
Chapter 7 Heritage and Culture	
Policy HC1 Heritage conservation and growth	London's historic environment is of strategic importance to the city's economy, culture and quality of life. A strategic approach is required for the integrating its conservation and enhancement with the city's development.
Policy HC2 World Heritage Sites	London's four World Heritage Sites are of international importance and a strategic approach is required to ensure development in London conserves, promotes and enhances their Outstanding Universal Value. Each of the four World Heritage Sites are located on the edge of two or more borough boundaries.
Policy HC3 Strategic and Local Views	Views that make a strategic contribution to the image and character of London require a strategic approach to their designation and managing. There is a strategic role for the Mayor to play in the promotion of a consistent approach to the designation and management of local views.
Policy HC4 London View Management Framework	Views that make a strategic contribution to the image and character of London require a strategic approach to their designation and managing.
Policy HC5 Supporting London's culture and creative industries	London's rich cultural offer and the creative industries deliver vital social benefits for Londoners and are a key part of London's economic success. Many cultural facilities serve a larger-than-local catchment, and some venues or clusters are of national or international significance.
Policy HC6 Supporting the night-time economy	Many areas of night time activity in London serve a larger-than-local catchment, and some areas are of national or international significance. Ensuring the continued success of those parts of London that have a vibrant night time economy is crucial for supporting this increasingly important part of London's economy, the Mayor's vision for a 24-hour city, delivering strong and inclusive communities, and growing a good economy.

Policy HC7 Protecting public houses	Pubs are a unique and intrinsic part of British culture, and London's pubs are a vital part of the built, social and cultural heritage of the city. Pubs play an important community role, bringing people together and meeting the needs of particular groups. The loss of pubs has affected many boroughs, and a consistent approach across London is needed to ensure that a lack of policies to protect pubs does not lead to further loss.
Chapter 8 Green Infrastructure and Natural Environment	
Policy G1 Green infrastructure	Green infrastructure performs a number of vital functions for London's environment and the wellbeing of Londoners. It is essential to understand the interrelationships between various types of green infrastructure at different scales and across borough boundaries. It is therefore important to plan and manage the protection and enhancement of green infrastructure strategically to ensure opportunities are optimised.
Policy G2 London's Green Belt	There is clear need to plan and manage London's Green Belt strategically to ensure that London's growth is guided to the most appropriate and sustainable locations and to protect the multiple beneficial purposes the Green Belt serves.
Policy G3 Metropolitan Open Land	Metropolitan Open Land (MOL) is by definition open land of strategic importance to London. It is crucial that it is planned and managed accordingly.
Policy G4 Local green and open space	The protection and enhancement of open space at various scales is important for London's environment and the wellbeing of Londoners. The protection of open spaces, including smaller spaces, is important as their contribution to London's total open space has a significant cumulative effect. It is important to consider deficiencies in access to open space at a strategic level as opportunities to address these may exist across borough boundaries
Policy G5 Urban greening	In planning for London's growth, it is important to ensure new developments contribute to improving urban greening as a key part of addressing the urban heat island effect, providing amenity space, sustainable drainage and enhancing biodiversity. A consistent approach is essential to ensure the benefits are felt across London, particularly in those areas with the most pressure for growth.

Policy G6 Biodiversity and access to nature	Many of London's habitats and species span borough boundaries. Biodiversity should be planned at a strategic level to ensure sites are properly protected and to ensure opportunities to improve London's biodiversity and Londoners access to it are realised.
Policy G7 Trees and woodlands	Cumulatively London's trees form an urban forest which is an important element of London's green infrastructure. It is therefore important to take a city-wide approach to protecting existing trees of value and improving tree provision as part of development proposals
Policy G8 Food growing	It is considered important to set strategic policy to protect existing food growing spaces and ensure boroughs identify opportunities for new community and commercial food growing as part of creating a healthier food environment and improving London's food security, as identified in the draft London Food Strategy.
Policy G9 Geodiversity	Geology has impacts on how and where buildings are constructed and how services are delivered across borough boundaries. As such London's geology and geodiversity should be considered at the landscape scale in strategic policy.
Chapter 9 Sustainable Infrastructure	
Policy SI1 Improving air quality	In preparing his strategies, the GLA Act requires the Mayor to consider the health of persons in Greater London and to put in place policies that aim to achieve compliance with legal Air Quality limits as well such other improvements of air quality.
Policy SI2 Minimising greenhouse gas emissions	Reducing greenhouse gas emissions is crucial to achieving the UK's targets and commitments on climate change mitigation. This is a key element of Good Growth and it is crucial that the London Plan sets a clear standard for development across London to provide certainty to applicants and to move towards becoming a zero-carbon city.
Policy SI3 Energy infrastructure	London's energy system is complex. The issues and opportunities relating to energy vary in scale and location. It is vital to plan decentralised energy at a strategic level to ensure these opportunities are realised and to make London's energy supply more secure and resilient.

Policy SI4 Managing heat risk	The Urban Heat Island and severe hot weather events are an issue across London and across borough boundaries. The current Building Regulations do not adequately assess all causes of over-heating so it is important for the London Plan to set strategic policies to ensure new developments do not overheat and minimise contributions to the Urban Heat Island.
Policy SI5 Water infrastructure	The water supply and treatment network in London is a large and complex piece of infrastructure; crossing borough boundaries and requiring a coordinated approach. If London is to meet the growing demand for water supply and treatment sustainably and efficiently, a strategic approach is essential. The water companies' Water Resource Zones also tend to be significantly larger than local authority areas.
Policy SI6 Digital connectivity infrastructure	Digital connectivity is a rapidly evolving sector. It is a comparatively new policy area, where the Mayor seeks to provide ambitious leadership and a consistent policy framework from which all Londoners can benefit. In order to compete as a global capital city, London relies on effective digital connectivity and smart technology.
Policy SI7 Reducing waste and supporting the circular economy	The management of waste within the capital requires cross-borough cooperation (as evidenced by the grouping of Waste collection and Waste Planning Authorities) and coordination to increase re-use and recycling and to achieve net-zero waste. This is particularly important as the capacity of London's landfills is expected to run out by 2026. Setting outcomes for the whole of London provides clear targets for London's waste authorities, ensuring London is able to process and dispose of waste in the future.
Policy SI8 Waste capacity and net waste self-sufficiency	Managing waste sustainably is a key challenge for London. Taking a strategic approach and setting a clear goal of net self-sufficiency provides a tangible framework for London to achieve sustainable and efficient waste processing. If London does not take a coordinated approach to waste management, there is the risk that London's waste will have impacts beyond its borders. Boroughs have already grouped together to form various Waste Collection and Waste Planning Authorities.
Policy SI9 Safeguarded waste sites	Safeguarding supports the goal of net self-sufficiency in waste capacity by ensuring adequate sites are available across London. The policy also provides strategic guidance for boroughs to support sub-regional waste planning arrangements. Many waste sites serve sub-regional catchments.
Policy SI10 Aggregates	Four authorities in London have land-won aggregates therefore Mayor provides strategic assessment to avoid duplication. Most aggregates used in the capital come from outside London. They are bulky materials and so require a strategic approach to their use, re-use and transportation, minimising movement especially by road.

Policy SI11 Hydraulic fracturing (Fracking)	. There is a clear strategy for delivering London’s energy needs sustainably, as identified through the London Plan and other Mayoral Strategies. Fracking is not supported as part of this mix consistent with the Mayors responsibilities for improving London’s environment in London and responsibilities under the GLA Act.
Policy SI12 Flood risk management	Flood risk is a strategic issue that requires coordination across local authority boundaries. In terms of tidal and river flooding, development upstream on the River Thames and its tributaries can have significant impacts on river flows downstream and vice versa. The Environment Agency's Thames River Basin District Flood Risk Management Plan and the Thames Estuary 2100 Plan also reflect the strategic geography for addressing flood risk.
Policy SI13 Sustainable drainage	It is important that London's drainage infrastructure prioritises sustainable drainage close to source in order to mitigate the very real risk of surface water flooding in urbanised London. The Drainage Hierarchy provides an established strategic framework for managing surface water run-off consistently across London.
Policy SI14 Waterways – strategic role	The network of London's waterways with the River Thames at their centre is an asset of strategic multi-functional importance for the whole of London and all Londoners.
Policy SI15 Water transport	It is important that London protects the existing passenger transport terminals and freight handling wharves in a coordinated and strategic manner in order to protect their ongoing use and function throughout the city.
Policy SI16 Waterways – use and enjoyment	London's Blue Ribbon Network is an integral part of the city's identity; maximising its use and enjoyment is of value to all of Greater London. To ensure maximum value from the use and development of waterway infrastructure, it is important that the Boroughs take a coordinated approach - this is best directed by the GLA.
Policy SI17 Protecting London’s waterways	London's Blue Ribbon Network is an integral part of the city's identity; protecting the character and heritage of this network requires a coordinated approach. Setting the strategic direction for London's waterways ensures Boroughs have a clear framework for assessing development proposals along and in waterways.
Chapter 10 Transport	

Policy T1 Strategic approach to transport	London has limited street space on which to move people and goods. A growing city necessarily entails increases in the demand for using streets to support the economy and sustain vitality. Given that London is already heavily congested, space-efficient modes of transport are essential to support and enable the delivery of new homes and jobs. This is a strategic issue for the Plan because without behaviour change (mode shift) and the delivery of significant new transport infrastructure across the city, London will struggle to grow and meet the needs of those who wish to live, visit or do business here. It will also be less able to optimise densities in much of the Capital, undermining further the delivery of homes and jobs.
Policy T2 Healthy Streets	In order to successfully enable people to use more space-efficient modes of transport, while supporting the increasing population of London, the Healthy Streets (HS) Approach must be adopted across London. This is a strategic issue for the Plan in that the HS Approach underpins the outcomes from many policy areas, including: public health, urban realm, the environment, the economy, housing and transport. Without changing the nature of London's streets, it cannot grow to the extent that it otherwise would, nor will it meet its potential in terms of quality of life. The health of Londoners is a key aspect of promoting social development in London as per the Mayor's duties under the GLA Act.
Policy T3 Transport capacity, connectivity and safeguarding	In order to successfully enable people to use more space-efficient modes of transport and enable future housing delivery and employment growth, land that supports transport functions and new transport schemes must be protected. This is a strategic issue given that transport is not solely borough-based and requires routes, alignments and land across the city to function across boundaries now, and in the future, as well as to expand to meet need and unlock growth.
Policy T4 Assessing and mitigating transport impacts	The transport impacts of development must be mitigated and assessed so that growth does not result in an unmanageable transport network. This is a strategic issue for the Plan because the transport network is integrated across the city and not specific to borough boundaries. TfL's duty to manage the network requires that it plan and mitigate impacts holistically as the city evolves.
Policy T5 Cycling	In order to successfully enable people to cycle as a space-efficient mode of transport, sufficient cycle parking and strategic routes must be in place. This is a strategic issue for the Plan as an absence of cycling infrastructure in one borough can prevent trips being cycled within other boroughs, some of which will be driven instead, making poor use of space as London grows and adding to congestion and undermining the deliverability of new homes and jobs.

Policy T6 Car parking, Policy T6.1 Residential parking, Policy T6.2 Office parking, Policy T6.3 Retail parking, Policy T6.4 Hotel and leisure uses parking	In order to successfully enable people to use more space-efficient modes of transport, prevent excessive encouragement of space-inefficient modes and make more efficient use of land more to support greater housing delivery (and other growth), the provision of car parking in new development needs to be managed across London. This is a strategic issue for the Plan as 59% of car driver journeys made by London residents start or end in a different borough, meaning that parking standards need to be considered at the regional level and require cooperation over a large area and to manage the road network effectively.
Policy T6.5 Non-residential disabled persons parking	In order to ensure that those disabled Londoners who drive are able to reach developments across London, disabled persons parking must be provided. This is a strategic issue for the Plan as local standards would not ensure consistent approach to provision across London. As a high proportion of trips start and end in different boroughs it is essential that such parking standards are considered at the regional level.
Policy T7 Freight and servicing	Freight movements need to be planned for in order to ensure network capacity is used as effectively as possible as London grows. Freight movements represent a significant proportion of traffic on London's roads, contributing to congestion and emissions, and presenting danger to the travelling public. This is a strategic issue for the Plan because the transport network including road, rail and water, is integrated and spread across borough boundaries and must be managed effectively to support and enable the delivery of new homes and jobs.
Policy T8 Aviation	The nature of aviation is that its impacts are not limited to a particular geographic location. Both the economic benefits and the environmental impacts (e.g. noise, air quality) are felt over a wide area, if not the whole of London and as such a strategic, pan-London, approach is essential. Moreover, individual airports function as part of a London airports system and the provision and utilisation of capacity needs to be considered holistically.
Policy T9 Funding transport infrastructure through planning	This is a strategic issue for the Plan as London cannot continue to grow without new or enhanced transport infrastructure to serve growing demand as well as to enable economic growth across the city. Equally, MCIL is set at the London-wide level to support the delivery of strategically important transport infrastructure, which can have transformative effects on the locations served, supporting thousands of additional homes and jobs.
Chapter 11 Funding the London Plan	
Policy DF1 Delivery of the Plan and Planning Obligations	The policy provides strategic direction regarding implementation of the Plan.

PQ2. Has the approach to planning in London described in paragraphs 0.0.21 and 0.0.22 of the Plan been agreed with all London Boroughs and other relevant interests, particularly with regard to the relationship between the spatial development strategy, local plans and neighbourhood plans, and the development management process?

1. Paragraphs 0.0.21 and 0.0.22 primarily deal with statements of fact about the Plan - that it forms part of every borough's development plan¹, and that as such the policies in the Plan do not need to be repeated at the local level, and the rationale behind the approach to the drafting of policies. There is no requirement for this to be agreed by boroughs and other relevant interests. In developing the Plan, significant consultation and engagement was undertaken, as set out in response to PQ8 and PQ9. However, the development of the SDS is bound by legislation² and associated regulations³ which afford the Mayor significant discretion on the content and style of the Plan, as long as it deals with matters of strategic importance to Greater London (see answer to PQ1).
2. The London Plan has been part of every boroughs' Development Plan in London since 2004. Therefore, London is used to working in a two (and in some places now three) tier planning system. Moreover, previous London Plans and associated guidance have included detailed approaches which have been designed to apply both to the development of development plan documents and to decision making.
3. This is the third 'new' Plan written for London under the 2004 Act – the first was the Ken Livingstone Plan published in 2004, the second was the Boris Johnson Plan published in 2011. There has now been 18 years of the GLA and the operation of the two (and since 2011, the three) tier planning system in London. Over that time the role of the Plan has evolved within the broad regulatory framework in which it sits. The legislation and regulations governing the Plan provide significant scope for varied approaches; this version of the Plan is tailored to the issues London faces now – learning from the experience of implementing a London Plan since 2004 – and setting out the right policy framework for how those issues can best be addressed.
4. The Plan is an aspirational but realistic one which seeks to accommodate projected growth within its boundaries in a way that delivers 'Good Growth'. It is clear about what it seeks to deliver and how that approach should be implemented across London. The whole of the Plan rests on its parts, and the clear planning framework that the Plan provides is crucial in achieving Good Growth. Without this framework – which ensures that design is of high quality, that development is suitable for the location, that potential is optimised, that a range of needs are met including affordable housing, that homes meet minimum standards, that industrial capacity is protected, that employment opportunities are promoted, and that new development is safe – the Mayor would not be able to support the level of growth identified in the Plan.
5. It is important the Plan does not simply set out this framework as a series of abstract ideals but puts in place concrete policies for how they should be achieved.

¹ Section 38 (2) Planning and Compulsory Purchase Act 2004

² Section 334 Greater London Authority Act 1999

³ The Town and Country Planning (London Spatial Development Strategy) regulations 2000

6. In some instances, the London Plan does go into detail. This reflects the complexity of planning strategically for London and balancing the many issues London faces, but it also helps to ensure that the policies are clear in how they should be applied, that strategic priorities can be met, that unnecessary duplication of evidence and policy is avoided, that the planning system is sped up, that planning applications can be made with a high degree of predictability and efficiency⁴, and that a framework for the development of London over the next 20-25 years can be provided as required by the regulations. It also reflects the recognition by many of the importance of consistency across London in order to tackle strategic priorities effectively.
7. As set out in PQ 8 and 9, significant levels of engagement and consultation were undertaken in developing the Plan. For some topics this engagement took place even before the Mayoral election and development of some policies started very soon after. So, for example, the policies on affordable housing in the draft Plan were informed by the extensive engagement undertaken in the development of the Affordable Housing and Viability SPG. Development of the SPG involved numerous meetings with boroughs (both officers and members, the development industry, agents and consultants and community groups) both before publication of the draft (between May and November 2016) and as part of the consultation process. Over 130 responses were received to the consultation, all of which were taken into account in the development of the final SPG. This has led to a robust policy approach which can be directly applied at the local level and has been informed by a wide variety of views and responses. The aim of developing a consistent approach to affordable housing was supported by many and has already started to improve the level of affordable housing being approved in referable applications.

Relationship with local development documents

8. On many issues, London Plan policies allow for local variation, and local development documents – including Local Plans – and neighbourhood plans will continue to play a crucial role in setting a local vision for the development of an area, identifying and addressing key issues affecting the area, and setting policies for how the strategic requirements of the London Plan can best be achieved in that area. In some cases, London Plan policies have specific requirements for local approaches to be developed, and the Plan makes clear where this is the case. It should also be noted that boroughs are required to be in ‘general conformity’ with the London Plan⁵. This means that boroughs can produce policies which deviate from those set out in the Plan where an approach that is more suitable to local needs would deliver the same strategic outcomes as the London Plan. The drafting of the London Plan policies does not (and cannot) change this.
9. The policies in the draft London Plan have been developed in a way that means it is not necessary for boroughs to duplicate the policies or evidence base at the local level and thus can free time and resources to focus on documents that identify and address key issues for their area, such as Area Action Plans, master plans, design codes and in supporting neighbourhood plans. Paragraphs 0.0.21 and 0.0.22 of the draft Plan seek to promote this approach. However, a number of respondents to the consultation, notably some boroughs, raised a concern that the drafting of the Plan sought to prevent boroughs from producing local plans and reflecting local circumstances.

⁴ NPPF 2012 paragraph 17

⁵ Planning and Compulsory Purchase Act 2004 24(1) (b)

10. To address this concern, the Mayor has suggested a change to paragraph 0.0.21 which makes it clear that flexibility exists to take account of local circumstances both within the policies themselves and in the requirement to be in general conformity with the Plan:

“Once published, the London Plan is part of the Development Plan. The Policies have been drafted in a way that allows London to implement this ambitious London Plan as soon as possible. There is no requirement for the policies to be repeated at the local level. However, in some instances a local approach is required within the context of the overall policy. The new London Plan clearly sets out where this is the case. In addition, the new London Plan does not preclude boroughs from bringing forward policies in their Development Plan Documents to achieve the aims of the London Plan in a way that takes into account local circumstances and evidence, where they consider it appropriate to do so”⁶.

11. In addition, other minor changes have been suggested to address specific areas where respondents had raised concerns about the Plan being too rigid in its approach (see for example a minor change in D2 F, which ensures that appropriate design scrutiny is undertaken, without requiring a specific design review).

⁶ Draft London Plan showing minor suggested changes. August 2018.

PQ3. In preparing the Plan has the Mayor had regard to the matters referred to at sections 41(4) and (5) of the GLA Act including health, health inequalities, achievement of sustainable development, climate change and its consequences, other relevant strategies, resources available for implementation, and the desirability of promoting and encouraging the use of the River Thames?

1. The requirements of sections 41(4) and (5) of the GLA Act are a key component of the London Plan and have been considered as part of a co-ordinated and integrated approach with other Mayoral strategies on relevant issues. The starting point for this was the City for All Londoners document – this set out a direction across key issues as part of a single consultation to inform key strategies and the London Plan. The requirements are also referenced at the beginning of the draft London Plan (paragraph 0.05) as part of the wider legislative context to which the Plan is required to respond. The requirements are addressed in turn below.

Mayoral Strategies

2. Since the start of the Mayor's term in 2016, new statutory strategies have been drafted (and in most cases adopted). The preparation of all the Statutory Strategies – including the Spatial Development Strategy – has been a co-ordinated and iterative process involving the Mayor and Deputy Mayors, and officers from across the GLA and the wider GLA family, with scrutiny by Assembly Members. This process led to the Mayor's publication [A City for All Londoners](#) (GLA 2016) which set out a strategic vision for London and the direction of travel for all the Statutory Strategies. A City for All Londoners was subject to extensive consultation. This document, and the feedback to it, fed into the development of the draft strategies, which were developed concurrently and in co-ordination, through an officer-level co-ordination group, sign-off by GLA Directors and relevant Deputy Mayors and ultimate decisions by the Mayor.
3. The Strategies have influenced one another, and many share common evidence. For example, both the Housing Strategy and the London Plan are underpinned by the 2017 Strategic Housing Market Assessment, and the London Plan enacts many of the aims of the Mayor's Transport Strategy through policies that promote sustainable modes of transport, including walking and cycling. There are also multiple links between the London Plan and the London Environment Strategy, particularly with regard to sustainable and green infrastructure. Mayoral Strategies are referenced through the London Plan and vice versa.

Health

4. A City for All Londoners identified how the health of Londoners is affected by a broad range of direct and indirect causes, from poor quality or unaffordable housing to air pollution and the need for access to green and open spaces. Policies in the London Plan were developed through joint working with the GLA's health team, and the impact of these policies was assessed through the Integrated Impact Assessment process, which included a health impact assessment. Good Growth Policy GG3 sets out how the London Plan will contribute to creating a healthy city and highlights the importance of addressing the wider determinants of health that are relevant across policies in the Plan¹. Other policies also have

¹ The wider determinants of health are a diverse range of social, economic and environmental factors which impact on people's health and life expectancy. They include transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks.

a more explicit focus on health outcomes, including the Healthy Streets Approach (Policy T2) and the policy addressing hot food take-aways (Policy E9).

Health inequalities

5. The Mayor's draft Health Inequalities Strategy was published for consultation in July 2017. Building on 'A City for All Londoners', which identified that health inequality in London is amongst the starkest in the country, the Health Inequalities Strategy was developed alongside and informed the draft London Plan, and sets out how the Mayor will seek to ensure that Londoners have access to healthy and affordable food and green and open spaces, that children are provided with environments in which they can play, eat, socialise and develop well, and that all Londoners can have access to good employment opportunities and a decent affordable home. These approaches are reflected in the draft London Plan, through Policy GG3 (as mentioned above) as well as other specific policies throughout the Plan that relate to the wider determinants of health. As part of the IIA, policies were also assessed for the impact on health inequalities.

Achievement of Sustainable Development

6. The achievement of sustainable development has been considered throughout the development of the London Plan and sits at its core. Chapter 1 of the Plan sets out that Good Growth – the guiding principle for the Mayor's vision for the development of London – is 'growth that is socially and economically inclusive and environmentally sustainable'. All the policies in the London Plan have been drafted with regard to the definition of sustainable development as set out in the 2012 NPPF, and the Plan as a whole seeks to address the three overarching objectives:
 - An economic objective – the London Plan supports the economic growth of London (Chapter 2, Chapter 6), underpinned by sound evidence that identifies the types and location of land required, and identifies and co-ordinates the provision of the infrastructure required to support this growth (Chapter 9, Chapter 10).
 - A social objective – the London Plan sets out how the housing needs of present and future generations of Londoners will be provided for (Chapter 2, Chapter 4), how a well-designed and safe built environment should be achieved (Chapter 3), how open spaces should be provided (Chapter 8) and how communities' health, social (Chapter 5) and cultural well-being (Chapter 7) will be supported.
 - An environmental objective – the London Plan contributes to protecting and enhancing our natural, built and historic environment (Chapter 7) by making effective use of land (Chapter 2, Chapter 8), improving biodiversity (Chapter 8) and using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change (Chapter 9).
7. Economic, social and environmental objectives formed a key part of the IIA framework and therefore helped to inform the development of all draft London Plan policies.

Climate change and its consequences

8. Climate change and its consequences is a key challenge identified in part 4 of a City for All Londoners, and a broad and detailed range of studies were commissioned to develop

relevant policies, including those in relation to green and sustainable infrastructure, particularly the circular economy, energy, flood risk and urban green factor.

9. Climate change is addressed in a number of policies throughout the draft London Plan:
 - Good Growth Policy GG6 focuses on London becoming a more efficient and resilient city to adapt to climate change and move towards London being a zero carbon city.
 - Climate change is a central tenet of the approach to green infrastructure, relevant across green infrastructure policies (chapter 8), including G1 (Green infrastructure), G5 (Urban greening), G7 (Trees and woodlands) and G8 (Food growing).
 - Climate change is a fundamental part of policies in chapter 9, which focus on London's Sustainable Infrastructure and includes policies that seek to reduce London's carbon emissions as well as mitigate against the consequences of climate change (this includes SI2 (Minimising greenhouse gas emissions), SI3 (Energy infrastructure), SI4 (Managing heat risk), SI5 (Water infrastructure), SI7 (Reducing waste and supporting the circular economy) and SI2 (Flood risk management), and SI13 (Sustainable drainage)).
10. Multiple objectives relevant to climate change formed part of the IIA framework against which all policies have been assessed and developed.

Resources available for implementation

11. The resources for implementation of the Plan are primarily addressed in chapter 11, which sets out the investment in infrastructure needed to deliver the London Plan, the gap between currently committed and required public sector spending and options for meeting this. A summary is provided across infrastructure types. Resources are also picked up in relevant chapters of the draft Plan. For example, the supporting text for policy H5 (Delivering affordable housing) emphasises the need to make the most efficient use of resources, including in relation to the provision of grant/public subsidy.

The desirability of promoting and encouraging the use of the River Thames

12. The use of the River Thames has been considered through the preparation of the Plan and is addressed across several policies in the sustainable infrastructure section:
 - Policy SI14 (Waterways – strategic role) addresses the strategic role of the waterways and the importance of reflecting the distinctiveness of areas that relate to the Thames through Thames Policy Area designations and the development of joint Thames Strategies which should cover measures for public access, public activity and nodes for passenger and freight transport.
 - Policy SI15 (Water transport) is focused on water transport, aiming to protect and enhance passenger transport capacity and supporting an increase in the amount of freight transported by river.
 - Policy SI16 9 (Waterways – use and enjoyment) promotes the use and enjoyment of waterways including improving and expanding the Thames Path and towpaths which are particularly important for safe access along the waterways.
13. There are other policies that are also relevant to the Thames. Policy SI5 (Water infrastructure) emphasises that Development Plans should protect and improve water quality in line with the Thames River Basin Management Plan. Policy SI12 (Flood risk management) sets out the approach to managing flood risk, including in relation to the

Thames. The Thames is also addressed spatially in relation to supporting text for relevant opportunity areas, the strategic functions of the CAZ and in relation to World Heritage sites.

PQ4. What, if any, implications does the Mayor consider that the publication of the revised National Planning Policy Framework on 24 July 2018 has for the content of the London Plan and the examination?

1. The publication of the revised NPPF has no direct implications for the content of the London Plan and the examination. At paragraph 214 the NPPF 2018 states that *'The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019.'* Footnote 69 clarifies that *'For spatial development strategies, 'submission' in this context means the point at which the Mayor sends to the Panel copies of all representations made in accordance with regulation 8(1) of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, or equivalent'*.
2. The Mayor reached this stage on 16 July 2018 and therefore the draft London Plan is to be examined in the context of the 2012 National Planning Policy Framework.
3. Notwithstanding the above, many of the revisions to the NPPF reflect the direction of travel of the draft London Plan.

PQ5 Which specific policies in the London Plan deviate from national policy and guidance?

PQ6 Given the legal requirement for the Mayor to have regard to the need to ensure that the London Plan is consistent with national policies^[1], what is the justification for each of the policies deviating from national policy and guidance?

- 1 The following response covers both questions as the answers are interrelated.
2. As set out in section 41 of the 1999 GLA Act, in preparing any strategy the Mayor shall have regard to the need to ensure that the strategy is consistent with national policies. While section 41 thus identifies a 'need' for the strategy to be consistent with national policy and guidance, it will be noted that the duty itself is to 'have regard to' this need. Consequently, while any deviation from national policy or guidance would need to be justified, provided the Mayor has regard to the need for consistency, there is no absolute requirement for the London Plan to be consistent with national policy or guidance.
3. The key document which sets out national policies on planning is the NPPF, which sets out the Government's planning policies for England. It provides a framework for delivering sustainable development, but within that framework, it allows for solutions to be tailored to meet the specific needs of the area¹. The 2012 NPPF is drafted with Local Planning Authorities in mind - it does not provide specific guidance for Spatial Development Strategies such as the London Plan. This has in the past created confusion in terms of the role of the NPPF, the London Plan and Development Plan Documents. The draft London Plan is clear that the Mayor has had regard to the NPPF and other relevant national policy in the development of a London-specific approach.
4. Due to London's differences both in terms of its two (and in some areas three) tier planning system and in the specific issues it faces, in some instances the draft London Plan, while having had regard to national policy, promotes a tailored approach which deviates from specific elements of national policy in order to deliver the same overall outcome of sustainable development. This approach is consistent with Section 41 of the GLA Act and the NPPF, which states in paragraph 10 that 'plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.'
5. Therefore, while a limited number of policies in the draft Plan arguably deviate from specific aspects of national policy, the Mayor considers these differences necessary in ensuring that the Plan is consistent with the underlying aims of national policy. In fact, the tailoring of certain aspects of national policy to reflect London's unique circumstances is essential if London is to deliver the overarching objective of sustainable development that national policy requires. The Mayor has sought to clarify this position through the minor suggested changes, which seek to update the original para 0.0.20 of the draft Plan as per below:

'The policies in the new London Plan have been developed over a number of years and are supported by a proportionate evidence base. The New London Plan seeks to develop an approach tailored for London to reflect the particular circumstances in the capital, and it will act as the key document shaping planning decisions across Greater London.'

^[1] GLA Act section 41.

¹ NPPF 2012 paragraph 1

6. The following section of this response sets out the rationale for those policies (or elements of policies) in the plan which could be considered to deviate from specific elements of the NPPF 2012 or specific elements of other relevant national policy, while contributing to the NPPF's overall aim of sustainable development.
7. In addition to the above, Policy SI11 Hydraulic Fracking can be considered to be inconsistent with the Written Ministerial Statement (Energy Policy: Written statement) which was published May 2018, this is also discussed below.

Policy H2 (H) Small sites and small housing developments

2. Policy H2 (H) states that boroughs wishing to apply affordable housing requirements to minor developments should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions. Furthermore, boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development. The intention of this approach is to help ensure that any contribution sought from minor development will not impact on deliverability.
3. Supporting paragraph 4.2.12 recognises the significant unmet need for affordable housing in London and that for some boroughs, sites of ten or few units are the main source of supply and play an important role in contributing to affordable housing delivery. In view of these circumstances, the Mayor is supportive of the inclusion of policies requiring affordable housing from minor developments in Development Plans.
4. Through a Written Ministerial Statement², in November 2014 the Government set out that 'for sites of 10-units or less, and which have a maximum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought. This will also apply to all residential annexes and extensions'. Further guidance on this approach was provided in the PPG in 2016³.
5. This WMS and the PPG have to be read alongside the NPPF, which is clear that Plans should seek to meet their objectively-assessed need for market and affordable housing and, where a need for affordable housing has been identified, set out policies for meeting that need⁴. The NPPF also supports the delivery of mixed and balanced communities.
6. As detailed in the Plan, and evidenced by the SHMA, London has a significant need for affordable housing. For many boroughs, minor development makes up a significant proportion of their housing supply⁵. If boroughs are unable to require affordable housing contributions on minor developments, then their ability to deliver the affordable homes identified by the SHMA, as required by the NPPF, is significantly curtailed. Policy H2 does not require boroughs to seek planning obligations from minor development. Boroughs

² Written ministerial statement – 'Small scale developers' – Brandon Lewis Minister of State, Department for Communities and Local Government November 2014

³ Paragraph: 031 Reference ID: 23b-031-20161116

⁴ NPPF 2012 paragraph 47, 50

⁵ London Development Database data shows on average over the financial years 2014-2016 completions of less than ten units made up 20 per cent of London's total conventional completions and for four boroughs (Hammersmith and Fulham, Kingston upon Thames, Merton and Richmond upon Thames) represented over 40%

which do so would be expected to enact any such requirements through their Local Plans, which must be supported by proportionate evidence and have regard to the proscription in Policy H2 on seeking affordable housing contributions in-kind.

7. As recognised in the Court of Appeal's Judgement on the legal challenge to the WMS⁶, while the WMS is set out in unqualified terms, that does not mean it must necessarily be applied without any consideration of its impact on delivering the aims of the Plan, including sustainable development. The purpose of the WMS was to remove the 'disproportionate burden of developer contributions', however, a tariff-based policy can be developed which takes this into account, based on viability evidence, while still ensuring affordable housing contributions are secured where viable, particularly taking into account the value of residential development in London. Therefore, it is appropriate for the Plan to recognise the potential role of affordable housing contributions from minor developments in meeting local and strategic affordable housing needs.
8. This approach has already been taken in some London Boroughs:
 - The Inspector examining Camden's Local Plan⁷ concluded that it was appropriate for Camden to apply lower thresholds than national policy. This was justified by Camden's affordable housing needs and evidence to show the scale of contribution that in-lieu contributions could make towards meeting local affordable housing needs. Furthermore, Camden prepared evidence which demonstrated the proposed tariffs would not jeopardise the delivery of small sites.
 - The London Borough of Richmond adopted a policy requirement for affordable housing on minor development in the Richmond Core Strategy 2009 (15.B Some form of contribution towards affordable housing will be expected on all new housing sites). In 2017 an inspector determining a planning appeal in Richmond concluded⁸ that the need for affordable housing in Richmond should carry more weight than the 2014 ministerial statement on the subject. This followed a letter from PINS which acknowledged that the effect of the WMS was not to reduce the weight that should be given to the statutory development plan, or automatically to outweigh relevant development plan policies⁹. This was justified on the grounds that small sites comprise a significant proportion of Richmond's housing supply and that the required levels of contribution would not harm the viability of developing small sites. In addition, there have been a significant number of appeal decisions in Richmond and other London Boroughs which, whilst acknowledging that the Ministerial Statement is a material consideration in determining planning applications, supported the councils' decision that greater weight should be given to Development Plan requirements for contributions towards affordable housing from small sites where justified by housing need and other local circumstances.

⁶ Secretary of State for Communities and Local Government v West Berkshire District Council and Reading Borough Council C1/2015/2559 [2016]

⁷ Report on the Examination of the Camden Local Plan. 2017 Paragraph 64
https://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3586840&

⁸ Appeal decision by S.J. Buckingham 29 June 2017, 2-4 Heath Road, Twickenham. Appeal Ref: APP/L5810/W/17/3168508

https://www2.richmond.gov.uk/docs/ExaminationIndex/PI_Appeal_3168508.pdf

⁹ https://www.richmond.gov.uk/media/13314/planning_inspectorate_reply-march-2017.pdf

- Richmond has continued this approach in its Local Plan (2018), which requires a financial contribution to the Affordable Housing Fund commensurate with the scale of development for all minor development. The Inspector examining the Plan was satisfied that the scale of Richmond’s affordable housing needs, coupled with local evidence to show the requirement would not disproportionately burden the developer, justified the local requirement¹⁰.
9. In conclusion, the Policy provides a tailored approach to deliver the affordable homes London needs as required by the NPPF. The purpose of the WMS and the PPG is not to preclude seeking contributions from small developments per se, but to ensure that small developments are not the subject to disproportionate burdens. The evidence presented to, tested at and accepted in the Camden and Richmond Local Plan examinations demonstrates that there are parts of London where seeking a contribution for affordable housing will not have that effect. Therefore, justification for a tailored approach has already been recognised through the examination of a number of borough development plan documents and appeal decisions. The London Plan seeks to recognise this and bring more minor development forward by simplifying the approach to affordable housing and promoting a tariff-based approach where appropriate.

Policy H9 (A) Vacant Building Credit

10. Section A of policy H9 sets out that, in most circumstances, the application of the Vacant Building Credit will not be appropriate. The Vacant Building Credit (VBC) policy was introduced by a WMS¹¹ in 2014, and applies to sites where a vacant building is brought back into any lawful use or is demolished or replaced by a new building. In either case, the gross floorspace of the relevant vacant building(s) can be used as a ‘credit’ when the LPA calculates any affordable housing contribution. Affordable housing contributions may be required for any increase in floorspace. The vacant building credit applies to vacant buildings that have not been abandoned. Prior to redevelopment almost all buildings can be described as empty or redundant, thus potentially the VBC has a very wide application. Further guidance was published in the Planning Practice Guidance in 2016¹².
11. The aim of the VBC is intended to incentivise brownfield development, including the redevelopment or reuse of empty and redundant buildings. It is based on the premise that affordable housing requirements may prevent those sites from coming forward.
12. Policies H5, H6, H7 and H9 of the draft London Plan seek to meet London's affordable housing need in line with para 47 and 50 of the NPPF (2012). The vast majority of development sites in London are brownfield sites, most of which have existing buildings on them. Applying the VBC would significantly reduce London's ability to meet its identified need for affordable housing and is unlikely to lead to more sites coming forward.
13. The policies in the Plan seek to ensure suitable brownfield land comes forward for housing while ensuring that affordable housing is secured where viable and that the requirement for affordable housing is embedded in land values. The threshold approach to affordable housing allows sites which legitimately cannot meet the affordable housing threshold to be considered under the viability tested route and thus the VBC is not required as an incentive

¹⁰ Report to the London Borough of Richmond upon Thames. 2018 paragraph 36 and 37

https://www.richmond.gov.uk/media/15774/lp_inspectors_report_and_main_modifications.pdf

¹¹ Written ministerial statement (HCWS50)– ‘Small scale developers’ – Brandon Lewis Minister of State, Department for Communities and Local Government November 2014

¹² Paragraph: 021 Reference ID: 23b-021-20160519

to bring those sites forward. In those circumstances, the London Plan already contains sufficient safeguards to ensure that the requirement for affordable housing does not adversely affect the redevelopment of brownfield sites. It is for this reason H9 A states that the application of the VBC will not generally be appropriate.

14. This is considered to be consistent with the underlying objective of the PPG. Moreover, any other approach would seriously jeopardise the prospects of meeting London's affordable housing needs, which would place the Plan in conflict with other aspects of national policy.

Policy H16 Gypsy and Traveller accommodation – definition

15. The draft London Plan deviates from national policy by including a definition of Gypsies and Travellers that is broader than the one used by Government¹³. This is to address concerns that the existing Government definition does not recognise many Gypsies and Travellers, which is leading to their needs not being assessed or addressed sufficiently.
16. Under the Public Sector Equality Duty (PSED) of the Equality Act 2010, the GLA is required to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different groups, with Gypsies and Travellers falling under the protected characteristic grouping of race. In line with this, and the NPPF's aim of addressing the need for all types of housing, the Plan sets out a definition which more accurately reflects the diversity of the Gypsy and Traveller community, in order to ensure that their accommodation needs are properly taken into account for planning purposes.
17. Because the draft London Plan definition is broader than that given in national policy, the minimum requirements of national policy will still be met. It is not considered that making adequate provision for a wider class of Gypsies and Travellers renders the London Plan inconsistent with national policy.

Policy G2: London's Green Belt

18. The London Plan is consistent with the aims of the NPPF in providing strong protection for Green Belt land, whilst promoting its enhancement for appropriate uses.
19. The 2012 NPPF (paragraphs 87-88) requires substantial weight to be given to any harm to the Green Belt in decision-taking, with inappropriate development, by definition, considered to be harmful to the Green Belt. The Mayor strongly supports the continued protection of the Green Belt and a robust approach is therefore taken to achieve this. Hence, the starting point for London Plan policy G2A is to protect the Green Belt from inappropriate development, with a clear stipulation for refusal for development proposals that would cause harm. The Mayor does not consider there is any inconsistency with national policy in this respect.
20. The second part of G2A picks up on the uses that should be supported within the Green Belt. This reflects the intentions of the 2012 NPPF with regard to planning positively to enhance the beneficial use of the Green Belt (paragraph 81).

¹³ Planning Policy for traveller sites 2015 – Department of Communities and Local Government.

21. With regard to Green Belt boundaries, the 2012 NPPF refers to boundaries being altered only in exceptional circumstances through a Local Plan review, in which context paragraph 84 highlights the need to take account of sustainable patterns of development.
22. Policy G2B is clear that removal of land from the Green Belt (“de-designation”) will not be supported, with support only applying to extensions. The strong emphasis on the protection of Green Belt land is justified as the spatial strategy prioritises brownfield land for London to meet its growth in a sustainable way. The focus on prioritising brown field land is consistent with the NPPF.
23. The supporting text for policy G2 (paragraph 8.2.1) highlights the provisions of the NPPF in managing development and defining Green Belt boundaries, hence they are not repeated. Policy G2 is therefore considered to be consistent with the aims of national policy whilst being tailored to the circumstances of London and the overall spatial development strategy.

Policy SI11: Hydraulic Fracturing

24. The Mayor’s policy is consistent with the 2012 NPPF against which the draft London Plan is being assessed.
25. The Mayor, through the London Plan and other Mayoral strategies, has a clear strategy for delivering London’s energy needs as part of the overall approach to being lean, clean and green. Fracking is not supported as part of this mix, in line with the draft London Plan policies on climate change, reducing greenhouse gas emissions and improving air and water quality, which are consistent with broader UK and EU policy and legislation.
26. Since the plan was drafted, a Written Ministerial Statement¹⁴ was released in May 2018 which set out the Government’s intended approach to planning for shale gas and the weight that the Government expects to be given to its extraction and exploration. This set out that ‘Plans should not set restrictions or thresholds across their plan area that limit shale development without proper justification.’
27. Whilst Policy SI11 could be considered to be inconsistent with the WMS, the Mayor considers there to be proper justification for the approach set out in the draft plan, particularly with regard to climate change and carbon emissions, impacts on air quality, water stress and contamination, and impacts on Green Belt/MOL. In considering these matters, the Mayor has also had regard to the fact that the shale gas resource in London is not significant and that it is highly unlikely that there is any geologically suitable site.
28. Having weighed up other policies and objectives concerned with the environment, energy and health, it is considered appropriate for the Mayor to set out a strategic policy to restrict fracking in the London Plan.

¹⁴ [Energy Policy: Written statement – \(HCWS690\) made by Greg Clark Secretary of State for Business and Industrial Strategy](#)

PQ7. Having regard to the findings of the Inspector in 2014 regarding the Further Alterations to the London Plan, does the Mayor consider that the duty to cooperate set out in section 33A of the Planning and Compulsory Purchase Act 2004 applied to the preparation of the London Plan?

1. No. The Mayor believes that the duty to co-operate (DtC) does not apply to the preparation of the draft London Plan.
2. The DtC was introduced through section 110 of the Localism Act 2011, which added a new section 33A to the Planning and Compulsory Purchase Act 2004. The duty applies to specified categories of organisations and/or people in respect of particular strategic planning activities.
3. There are three specified categories of organisations and people that the duty applies to: a local planning authority; an English county council which is not a local planning authority; and a body, or other person, that is 'prescribed' or of a 'prescribed description'. The Mayor of London is a 'prescribed person' for these purposes – a designation made by the Town and Country Planning (Local Planning) (England) Regulations 2012.
4. The planning activities covered by the DtC are:
 - the preparation of local development plan documents (LPDs);
 - the preparation of other development plan documents (DPDs);
 - the preparation of marine plans;
 - activities that can reasonably be considered to prepare the way for the above activities; and
 - activities that support activities in the first three of these categories, insofar as they deal with 'strategic matters' – defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, and including in particular strategic infrastructure that has or would have a significant impact on at least two planning areas.
5. The London Plan, the Mayor's spatial development strategy, is part of the development plan relating to London, but is not itself a DPD. Section 38 (2) of the Planning and Compulsory Purchase Act 2004 defines the development plan of any area in London as the spatial development strategy and DPDs which have been adopted or approved in relation to that area.
6. Two alterations to the London Plan examined since the Duty to Cooperate was introduced in 2011 have considered the issue of Duty to Cooperate: the 2013 Revised Early Minor Alterations to the London Plan (EiP 2012) and the 2015 Further Alterations to the London Plan (EiP 2014). The Inspectors examining those alterations have reached differing conclusions on whether the Duty to Co-operate applies:
7. The Inspector considering the 2013 Revised Early Minor Alterations to the Plan concluded that the DtC does not apply to the preparation of the London Plan, observing in paragraph 6 that:

"The Mayor is a prescribed person for the purposes of the duty but the London Plan is in effect a regional strategy (RS), the preparation of which does not fall within the list of

activities covered by the duty, such as preparation of Development Plan Documents (DPDs). Activities that can reasonably be described as preparing the way for activities such as DPD preparation fall within the duty. However, I do not agree with the South East Waste Planning Advisory Group and the East of England Waste Technical Advisory Body that the LP can be considered to meet this definition, since its production is an activity in its own right¹.

8. In contrast, the 2014 FALP inspector concluded that the duty to cooperate does apply, on the grounds (para 7) that:

“The preparation of the FALP is an activity in its own right but it must, in my view, also prepare the way for and support the preparation of development plan documents”².

9. However, in paragraph 12 he went on to say:

“Under Section 20(7)(C) of the 2004 Act it is not possible to rectify a failure to meet the duty to co-operate and if the duty has not been met, a development plan document cannot be found to be sound. However, as has already been established, the FALP is not a development plan document nor is the GLA a local planning authority. In a strict legal sense, therefore, the failure of the Mayor to comply with the duty does not automatically mean that the FALP cannot be found to be sound.”

10. It is the Mayor’s view that 2013 Inspector was correct, and that the London Plan is a planning activity in its own right. While the Plan will inform the development of development plan documents it cannot be described as an activity that ‘prepares the way’ for an LPD or DPD, nor is it a ‘supporting activity’ for other planning documents.
11. The FALP inspector argued that the London Plan prepares the way for Local Plans, as they must be in general conformity with the London Plan. However, while local plans do have to be in general conformity with the London Plan, the existence of the London Plan is not a pre-requisite for a local development plan document. If no London Plan existed, borough Local Plans could still come forward.
12. Similarly, the SHMA and SHLAA are both important pieces of work that are key evidence bases for the London Plan. They do inform the development of local plans, but they do not prepare the way for them, nor are they supporting activities for those local plans. They are documents that are prepared primarily to support the London Plan, which is a planning activity in its own right.
13. In considering the two conflicting views, it is worth noting why the duty to cooperate was introduced. The 2011 Act saw the removal of the regional tier of Government and the abolition of Regional Spatial Strategies (RSSs) across England. The Duty to Cooperate was introduced to address the gap left by the loss of the Regional Level and the RSSs in the rest

¹ Report on the Examination into the Revised early Minor Alterations to the London Plan, Geoff Salter, June 2013 <https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/revised-early-minor>

² Report on the Examination in Public into the Further Alterations to the London Plan, Mr A Thickett, 18 November 2014 <https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/further-alterations-london>

of England. However, in London the SDS remained in place, as did regional governance. The 2011 Act did not change this, nor did it create any 'gap' in London which needed to be filled by extending the DtC to the London Plan. If it had been Parliament's intention that the duty to cooperate would apply to the SDS, then the preparation of the SDS would be included in 33A (3) and the Mayor of London in Section 20 of the 2004 Act.

14. It is also important to note that while the FALP inspector concluded the DtC did apply, he was clear that the London Plan is not a development plan document and thus failure to comply with the DtC does not automatically render the plan unsound. In the Mayor's view, this supports the 2013 Inspector's conclusion that the DtC does not apply. If the Mayor were subject to the DtC, sanctions for non-compliance ought also to apply but, as the FALP Inspector accepted, there is no sanction for a failure to comply with that duty.
15. Although it does not apply to the preparation of the London Plan, the legislation is clear that the Mayor is bound by the DtC with regard to the preparation of other authorities' plans – including those of the London boroughs and of authorities neighbouring London (and they are required to co-operate with the Mayor in this regard). Alongside this requirement, London boroughs' plans must be in general conformity with the London Plan (Planning and Compulsory Purchase Act 2004 S.24(4)a).
16. Irrespective of whether, as a matter of law, the Duty to Cooperate extends to the preparation of the London Plan, the preparation of the Plan has included constructive and ongoing engagement with a range of stakeholders, including London Boroughs and the prescribed bodies.
17. The main statutory requirements for the preparation of the Plan are set out within sections 334 to 343 of the Greater London Authority Act 1999 (as amended). The requirements for publicity and consultation are provided in the Town and Country Planning (London Spatial Development Strategy) Regulations 2000. Under these provisions, the Mayor has duties to:
 - consult on the London Plan with counties/districts adjoining London (GLA Act section 335).
 - inform local planning authorities in the vicinity of London of his views concerning any matters of common interest relating to the planning or development of London or those areas (GLA Act sections 339 and 348).
18. In addition, with regard to areas beyond London's boundaries, Planning Practice Guidance paragraph 7³ states 'cooperation between the Mayor, boroughs and local planning authorities bordering London will be vital to ensure that important strategic issues, such as housing delivery and economic growth, are planned effectively'. This statement is supported by the Mayor and the work carried out for the development of the Plan demonstrates the commitment to this approach. See response to PQ8, PQ9 and PQ12 for more detail on how the Mayor has engaged with stakeholders, and the consultation that has taken place.

³ <https://www.gov.uk/guidance/duty-to-cooperate> - 007 Reference ID: 9-007-20140306

PQ8. Irrespective of the answer to PQ7, did the Mayor engage constructively, actively and on an on-going basis during the preparation of the London Plan (a) with all relevant local authorities and other prescribed bodies in London¹ and (b) all relevant local authorities and prescribed bodies outside London on strategic and cross boundary matters in the wider South East?

1. As discussed in answer to PQ7, the Duty to Cooperate does not strictly apply to the preparation of the London Plan. However ongoing, active and constructive engagement has taken place during the preparation of the London Plan policies with London Boroughs and prescribed bodies and this is set out below.

London Boroughs

- 2 The GLA has worked with London boroughs closely over the period of Plan development in a number of ways as follows:
 - The GLA organised specific topic-based workshops and steering groups throughout 2017 which borough officers contributed to which informed policy development within the Plan, including energy, zero-carbon, waste, Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment, affordable housing and viability, town centre network and retail, approach to industrial land, and transport. See Annex A for further details of these workshops and steering groups.
 - The housing targets in the Plan are underpinned by the Strategic Housing Land Availability Assessment. The assessment of capacity from large sites was an exercise carried out jointly with the London Boroughs (see answer to PQ9 and the SHLAA 2017 report for more details).
 - Between July and November 2017, the GLA had senior officer meetings with every London borough individually. These meetings discussed strategic planning issues, emerging London Plan policies, specific local borough planning issues, evidence base and research work as appropriate and future collaboration arrangements.
 - GLA officers attended the regular meetings of the ALBPO (Association of London Borough Planning Officers) Development Plans and Planning Officers groups. This is the main meeting and email circulation group for London borough (and the two Mayoral Development Corporation) planning policy officers. These meetings are also regularly attended by representatives of London Councils. The notes and presentation from these meetings are shared via email with an extensive list of borough planning officers. At these meetings GLA Planners presented and discussed and sought feedback on evidence base reports and their findings and recommendations for future policy. Later in the process of preparing the Plan, early policy options across

¹ Including the bodies prescribed under regulation 4 of *The Town and Country Planning (Local Planning) (England) Regulations 2012*.

the Plan were presented and discussed with these groups. The feedback received at these meetings informed future iterations of policy.

- All relevant boroughs were also invited to comment on the draft text for the relevant opportunity area in Chapter 2 prior to publication of the Plan.
3. As part of the Mayor's duty to co-operate with regard to the preparation of borough Local Plans, GLA officers engaged extensively with London boroughs through the development of their Local Plans and Opportunity Areas where local and emerging strategic policy approaches were discussed. This also provided the opportunity to identify key issues affecting the boroughs and explore if and how the London Plan could help address those issues. See Annex B for a list of the meetings with boroughs and key issues discussed.
 4. In addition to the above, London boroughs also attended and contributed to the wider stakeholder events which are discussed in more detail in PQ9 (New London Plan Event – March 2016 and the City for All Londoners series of events in October 2016). In terms of the formal consultation on the Draft Plan itself, as well as the 4 sub-regional events, the GLA organised 2 borough specific events to debate policies within the draft Plan with the London boroughs. See Annex C for the list of formal consultation events.

Prescribed bodies

Environment Agency

5. The GLA has held regular meetings with the Environment Agency both at senior and officer levels. During 2017 GLA officers have met with EA officers bi-monthly to discuss emerging policy options on waste, green infrastructure, air quality, water, flooding which fed into the development of the London Plan and the London Environment Strategy. These meetings also covered issues such as the Thames Estuary 2100 and its implications for the London Plan. In addition, quarterly senior management meetings were held to discuss overarching strategic issues to ensure robust collaboration arrangements.
6. There were also 2 specific meetings with the EA in April 2016 and Jan 2017 to discuss potential issues to be included in the London Plan and emerging policy options as they came forward. In May 2017, a technical seminar on water infrastructure and waterways. The GLA has also met quarterly with the EA to discuss the Regional Flood Risk Appraisal.
7. The EA attended workshops in March 2017 and September 2017 which debated policies on green infrastructure, biodiversity and climate change policies. The EA are members of the Housing Market Partnership Group which is the key stakeholder group informing the development of the SHLAA and SHMA.
8. The EA was also involved in the preparation of the Integrated Impacted Assessment through an external workshop in June 2016 which informed the IIA framework, including the guide questions. The EA responded to the consultation on both scoping report in February 2017 and the IIA report in Dec 2017.

Historic England

9. The GLA held regular meetings with Historic England (HE) throughout the preparation of the London Plan in 2016 and 2017 – see Annex B. These meetings covered all aspects of the London Plan policy. Early policy options were shared with HE, and the GLA responded constructively to HE feedback. HE and GLA have worked closely on the detailed content of the draft policies particularly regarding the design and heritage related policies.
10. HE is a member of the Housing Market Partnership Group.
11. HE was also involved in the preparation of the Integrated Impacted Assessment through an external workshop in June 2016 which informed the IIA framework, including the guide questions. HE responded to the consultation on both scoping report in February 2017 and the IIA report in Dec 2017.

Natural England

12. Workshops were held with Natural England in March and November 2017 on policy options around green infrastructure policies, urban greening and biodiversity – see Annex B. These discussions fed directly into the development of policies within Chapter 8.
13. NE was involved in the preparation of the Integrated Impacted Assessment through an external workshop in June 2016 which informed the IIA framework, including the guide questions. NE responded to the consultation on both scoping report in February 2017 and the IIA report in Dec 2017 as well as being consulted on the HRA report prior to its publication for wider consultation.

Homes and Community Agency

14. In London, the land acquisition and social housing powers of the Homes and Communities Agency for London, including receiving grant from central government for housing purposes have been carried out by the Mayor since April 2012.

Primary Care Trusts

15. The GLA held a series of meetings with the Director of the London Healthy Urban Development Unit and the Director of the Office of London CCGs which supports the 32 Clinical Commissioning Groups in London. The meetings discussed the provision of health and social care facilities in London, changes to NHS policy, Sustainability and Transformation Plans, and planning for population growth. These discussions informed the development of policies S1 and S2.

Transport for London

16. TfL is part of the GLA family and the GLA and TfL have worked closely in the preparation of the London Plan. During 2016 / 17, there were bi-monthly meetings where the preparation of the evidence base and development of policy options were discussed to ensure the alignment of the MTS and the London Plan. TfL were closely

involved in the draft of Chapter 10 and inputted into the development of other areas of the Plan, including public realm, design, density etc.

Highways England

17. The GLA met with Highways England in June 2016 and again in January 2017 to discuss potential implications of the emerging London Plan policy option for the strategic highways network, particularly the M25 but also for the major motorways. Highways England's Strategic Economic Growth Plan and the evidence base underpinning it and well as emerging evidence supporting the London Plan were also discussed. These discussions helped inform the policy options around the modal shift targets, air quality policies, health streets, and car parking, etc.

Marine Management Organisation

18. GLA officers met with the MMO in July 2017 to discuss the London Plan and the Marine South East Plan processes and emerging policy issues including water quality, infrastructure, aggregates, climate change and biodiversity. The MMO also participated at the Waterways Forum's Freight and Development Group's first meeting in Dec 2017, where the draft London Plan was presented and debated.

Engagement with authorities outside London

19. As discussed in response to PQ7 although the formal DtC does not apply to the process of London Plan preparation, under the GLA Act the Mayor has duties to:
 - consult on the London Plan with counties/districts adjoining London (GLA Act section 335).
 - inform local planning authorities in the vicinity of London of his views concerning any matters of common interest relating to the planning or development of London or those areas (GLA Act sections 339 and 348).
20. The Mayor has fulfilled these duties and has engaged constructively, actively and on an on-going basis with the local authorities across the Wider South East (WSE) (i.e. the former East and South East of England) during the preparation of the draft London Plan.
21. During 2015, jointly with partners from the East of England Local Government Association, South East England Councils and London Councils, we established new collaboration arrangements. These arrangements complement the statutory Duty to Cooperate, which is less suitable for wider (beyond cross-boundary) strategic collaboration. The arrangement consist of:
 - a Political Steering Group – including nominated representative political leaders from authorities across the WSE meeting bi-annually to oversee the collaboration arrangements;
 - an Annual Summit for council members and officers from local authorities across the WSE as well as planning partnerships and Local Enterprise Partnerships;

- an Officer Working Group – including nominated representative senior officers from authorities across the WSE meeting quarterly to support the collaboration arrangements.
22. Further details about the WSE collaboration arrangements as well as all meeting papers, notes and more are available on the WSE website hosted by the GLA: <https://www.london.gov.uk/about-us/organisations-we-work/policy-and-infrastructure-collaboration-across-wider-south-east>
23. Current collaboration priorities include:
- the London Plan preparation
 - the common understanding of technical evidence to support plan making
 - tackling barriers to housing delivery
 - strategic infrastructure investment.
24. GLA officers have presented emerging London Plan policy options through to detailed WSE policy wording to many WSE meetings. The discussion and feedback from each of these meetings was carefully considered and fed into the iterative development of these policies. Overall, the emerging draft London Plan was discussed at six Officer Working Group meetings, three Political Steering Group meetings and three Summits (discussion topics and notes are available on the above-mentioned website). The December 2016 Summit centred around interactive and facilitated break-out sessions with close to 100 council members and officers aimed at helping to shape key London Plan issues. Further discussions took place during the consultation which also informed minor suggested changes to the Plan.
25. In terms of technical evidence, in July 2017, the GLA 2016-based population and household projections were released, which included data for all local authorities in England and national data for Wales, Scotland and Northern Ireland. The GLA engaged WSE partners throughout the preparation of this model. This demonstrates the GLA's ambition to facilitate better understanding/transparency and to work towards better consistency of the technical evidence base for plan-making.
26. A list Duty-to-Cooperate meetings with individual authorities and groups of authorities between the beginning of 2017 and the end of the draft London Plan consultation is set out in Annex D.
27. In line with emerging Policy SD3, the Mayor has made offers for strategic collaboration at WSE meetings throughout 2017. Collaboration arrangements between different willing partners have reached various stages; these are set out below.

East of England

- The GLA has had several officer-level meetings with South Essex Councils in recent months. These councils have established a shared long-term vision and are now making preparations for a Joint Strategic Plan, and the GLA is contributing to its evidence base. Due to its strategic nature there is scope for collaboration in particular on infrastructure. There are further opportunities for collaboration within the Thames Estuary – currently through the Thames Gateway Strategic Group - with authorities in London, South Essex and North

Kent involved. The recently published Vision Report from the Thames Estuary 2050 Growth Commission highlights the importance of a Joint Strategic Plan as well as opportunities for example related to regeneration and economic development. The Thames Estuary Production Corridor delivering large-scale cultural infrastructure is a good example of collaboration that can be built on.

- GLA officers and the Deputy Mayor have had meetings with Essex County Council over recent months. There is a shared interest in establishing collaboration on strategic issues such as housing and infrastructure delivery.
- London is part of the London Stansted Cambridge Corridor, and the GLA is involved in the London Stansted Cambridge Consortium. They are keen to continue the collaboration for example on the four-tracking of the West Anglia Line and opportunities arising from Crossrail 2.
- GLA officers contacted the Combined Cambridgeshire Authorities to discuss their approach to growth and explore collaboration opportunities related to their Strategic Plan for Growth Officers are awaiting their response.

South East

- Kent County Council indicated in their response to the draft London Plan interest in setting up London-Kent working group. A meeting with senior officers has been scheduled to take place in Sept 2018. Discussions are likely to include for example opportunities related to the Thames Estuary 2050 Commission (see above), the extension of Crossrail to Ebbsfleet and considering other potential growth locations.
- Oxfordshire County Council indicated in their response to the draft London Plan interest in collaboration on strategic infrastructure.
- Buckinghamshire County Council indicated in their response to the draft London Plan interest to explore possible future collaboration opportunities.

28. In addition to the above various authorities in the wider south east have also attended and contributed to the wider stakeholder events discussed in PQ9.

PQ9. Was the consultation carried out during the preparation of the London Plan in accordance with relevant legislation, and did it involve early and meaningful engagement and collaboration with the community, local authorities, organisations and businesses?

1. Yes, consultation was carried out in accordance with the relevant legislation.
2. Copies of the Spatial Development Strategy, the Integrated Impact Assessment and a Habitats Regulations Assessment were sent on 30 November 2017 to: the Secretary of State, Historic England, Natural England, English Nature, and every London Borough council.

3. Copies of the Spatial Development Strategy were sent on 30 November 2017 to the council of any county or district whose area adjoins Greater London.
4. Copies of the Spatial Development Strategy were also made available to the London Assembly and functional bodies.
5. Copies of the Spatial Development Strategy, the Integrated Impact Assessment and a Habitats Regulations Assessment were made available for inspection at City Hall and the principal office of the local planning authority for each London borough from Friday 1st Dec 2017 to Friday 2nd March 2017 as well as being available to view online. www.london.gov.uk/new-london-plan.
6. All copies of the Spatial Development Strategy that were made available for inspection or sent to the consultees described above were accompanied by a statement of the prescribed period within which representations may be made to the Mayor.
7. A notice of deposit of a proposed Spatial Development Strategy was given by advertisement as per the regulations.
8. In preparing the London Plan, unlike local plans there is no formal Regulation 18 stage. However, the consultation did involve early and meaningful engagement and collaboration. Below is an overview of the wide-ranging and extensive engagement and collaboration the GLA undertook in preparing the London Plan. Annex B provide a more detailed, but not exhaustive, list of engagement that took place during the preparation of the Plan.
9. Annex C shows the consultation events undertaken as part of the formal consultation period.

Early engagement and consultation

Outer London Commission

10. The Outer London Commission (OLC) was set up by the Mayor and facilitated by the GLA. It included representatives of business, London boroughs, the development industry and the voluntary sector. To inform preparation of the new London Plan, the former Mayor asked the Outer London Commission to develop three work streams. The first was to explore and advise on collaboration arrangements with the Wider South East; the second was to identify and address barriers to housing delivery; and the third was to examine the challenges London faces from demographic and economic growth pressures, and to identify potential spatial strategies for responding to these in a sustainable fashion. Further detail on the OLC and its membership can be found here: <https://www.london.gov.uk/about-us/organisations-we-work/outer-london-commission-olc/about-outer-london-commission>
11. The commission produced three issue papers for each of these work streams. The reports contained a number of consultation question which the commission asked for responses to over the summer of 2015. As part of this consultation the

commission held four sub-regional meetings attended by the public in July 2015 at which presentations were given and the audience debated the topics. Following the public consultation, the commission produced three reports making recommendations for the new London Plan. These reports informed the policy development in the London Plan. The OLC's reports, issues papers, meeting minutes and background papers can be viewed here: <https://www.london.gov.uk/about-us/organisations-we-work/outer-london-commission-olc/olc-and-full-review-london-plan>

New London Plan Event

12. The GLA organised an all-day event on 8 March 2016 to discuss the challenges and opportunities facing London and the issues and options which could be developed in a new London Plan with a wide range of built environment professionals and community groups. 70 external people attended including representatives from London Boroughs, Natural England, Environment Agency, Historic England, Community and industry groups, developers, housing associations, and campaign groups.
13. The day consisted of a series of key note speeches followed by table discussion on the themes of:
 - Accommodating London's growth
 - Working in London
 - Climate Change and resilience
 - People and communities
 - Infrastructure
 - Living in London
14. This early engagement event allowed the discussion of a wide range of options for the new Plan. The event was facilitated by GLA officers and the event and the notes from the table discussions were used to inform early development of the London Plan and associated evidence base.

A City for All Londoners

15. On 24 October 2016 the Mayor published 'A City for All Londoners' which set out his vision for London. The document outlined the top challenges and opportunities for London focusing on achieving sustainable growth. The concept of good growth was introduced in this document. The aim of the document was to initiate public discussion of these key issues to inform the preparation of the Mayors strategies, in particular the London Plan. A City for All Londoners can be viewed here: https://www.london.gov.uk/sites/default/files/city_for_all_londoners_nov_2016.pdf.
16. A large-scale and in-depth public consultation was undertaken for A City for All Londoners and the findings and feedback have informed the development of the London Plan and associated evidence base. Details of the extensive public consultation engagement are summarised below;

Letters and emails

17. Following the standard process of statutory consultation, after publishing A City for All Londoners on City Hall's website, formal responses and comments were invited by email or post for a period of 6 weeks: 24 October to 11 December 2016.

Workshops

18. As part of the City for All Londoners consultation in October and November 2016, a series of six workshops were held by City Hall policy teams. These workshops debated issues within themes of:

- accommodating growth
- transport
- an inclusive city
- environment
- housing
- economy

19. Invitations to attend were extended to industry experts and private and public-sector stakeholders including local boroughs, developers, think tanks, charities, consultancies, community groups and others. The agendas, presentations and attendees and transcripts of every roundtable discussion, can be found on <https://www.london.gov.uk/get-involved/all-consultations/city-all-londoners#acc-i-45205>

Community focus groups

20. In order to gain greater insight into how members of specific public communities' experience and view different policies, a series of seven focus groups with Londoners were organised. Groups were selected based on certain demographic characteristics, including women, LGBT+ Londoners, deaf and disabled Londoners, refugees and migrants, BAME Londoners, younger Londoners (17-25) and older Londoners (70+). Participants were sampled with support from City Hall's community relations team or via Talk London. Focus groups meetings were recorded, transcribed and thematically analysed in-house by the opinion research team. This insight then feed into the initial policy options of the Mayoral strategies, including the London Plan.

Online London community opinion

21. To gain a more general understanding of public views than the focus groups alone could facilitate, a number of discussions were hosted on Talk London, City Hall's online research community. Talk London is made up of a self-selecting sample of 40,000 Londoners, and hosts regular forum-style discussions on a range of relevant policy issues, as well as running regular online surveys. Questions taken from the main workshop events were used as discussion points.

22. The full consultation report of the City for All Londoners can be viewed here: <https://www.london.gov.uk/sites/default/files/acfal-consultation.pdf>

The development of the Mayor's other strategies

23. As set out in response to PQ3, the development of the policies in the London Plan has been coordinated with all the Mayor's other relevant strategies to ensure internal consistency and an alignment of policy. This includes the Mayor's Housing

Strategy, London Environment Strategy, the Mayor's Transport Strategy, the Mayor's Draft Economic Development Strategy, the Draft London Health Inequality Strategy, and the Mayor's draft Culture Strategy. The early engagement and consultation of these strategies with stakeholders, the public and London boroughs has also fed into the policy options and the development of the London Plan, including the minor suggested changes where relevant.

Ongoing engagement and collaboration through the preparation of the plan with stakeholder's groups

24. Over the course of preparing the London Plan from early 2016 to the statutory public consultation, GLA officers have held regular engagement meetings and event with various groups to keep them informed of the policy work being undertaken and engage in constructive dialogue. These meetings and engagement events are summarised below. Annex B details specific meetings, this list is not exhaustive, but gives an insight into the range of engagement that was undertaken.

Community and campaign groups

25. The GLA has engaged with community and campaign groups in the preparation of evidence and the formulation of policy during the preparation of the London Plan. The engagement has been via the following routes:
- direct meetings between the GLA and community groups (eg London Forum of Amenities and Civic Societies, Just Space, London Gypsy and Travellers, The Access Association, etc)
 - specifically invited stakeholder groups where London Plan topics were presented and discussed with GLA officers. These include groups organised by the GLA e.g. the Strategic Housing Market Partnership (GLA organise) and externally organised e.g Urban Design London sessions,
 - GLA organised meetings on specific topics e.g. presentation and discussion on the GLA's density research projects and viability
 - externally organised events and workshops focused on the new London Plan with GLA officers e.g. NLA London Plan charrette and Big Debates
26. The feedback from the engagement with these groups feed into the development of London Plan evidence and directly influenced the development of the draft policy.

Businesses and Development Industry

27. The GLA has engage with London's business, including the development sector, in the preparation of evidence and the formulation of policy. The engagement has been via the following routes:
- direct meetings between the GLA and businesses and representative groups
 - through stakeholder groups where London Plan topics were presented and discussed with GLA officers. These include groups organised by the GLA eg Strategic Housing Market Partnership, London Industry and Logistics Sounding

Board and externally e.g. London First, Planning and Development Advisory Forum

- specific GLA organised meetings on specific topic e.g. presentation and discussion on affordable housing and viability
- externally organised events and workshops focused on the new London Plan with London Plan officers e.g. NLA London Plan charrette and Big Debates

Stakeholder forums and workshops

28. The GLA organise and are members of several sector specific forums at which the GLA have presented evidence and policy options for discussion and feedback during the preparation of the London Plan. These forums provide an opportunity for detailed discussion on specific policies and issues that directly affect the participants. These include: Mayor's Academic Forum, London Industry and Logistics Sounding Board, London Aggregates Working Party, Inclusive Design and Access Panel (formally the Strategic Access Panel), the Planning and Development Advisory Forum, Regional Technical Advisory Boards, the Strategic Housing Market Partnership, Thames and London Waterway Forum, Affordable housing and viability Group, the London Gypsy and Traveller Forum, Build to Rent Forum, Retirement Housing Conference, Alliance for Childhood forum, London Energy transformation initiative, etc.

Infrastructure Providers

29. Throughout 2017, the GLA has actively engaged major utility providers and other stakeholders including transport providers, contractors, engineers, developers, consultancies, and others (specifically: Thames Water, SGN, UKPN, National Grid, Cadent, SSE), the Environment Agency, TfL, Network Rail, and London Councils) in the development of the infrastructure mapping tool which support the London Plan and is a key piece of evidence.

The London Assembly and the functional bodies

30. The Mayor actively engaged with the London Assembly during the plan-making process for the London Plan. GLA offices attended Assembly Committee meeting at which GLA Planners presented and discussed evidence base reports and their findings and recommendations for future policy and emerging direction of travel on policy. The Assembly's comments through these meetings and its reports informed the development of London Plan policies.

31. GLA officers worked with the GLA functional bodies of the Mayor's office for Policies and Crime and the London Fire Commission, and Transport for London in the preparation of London Plan policies, particularly those policies related to the body's responsibility. This engagement involved seeking the body's advice on policy content, discussing policy options and early drafts of policies. In regard to Transport for London, GLA officers worked closely with TfL in the preparation of the Mayor's Transport Strategy and its alignment with the London Plan.

32. GLA officers engaged with the Mayor's Development Corporations (the London Legacy Development Corporation and the Old Oak and Park Royal Development Corporation) in preparing the London Plan. This work was particularly linked to the development of the MDCs' Local Plans. In addition, through their role as local planning authorities, the GLA worked with the MDCs in the preparation of the London Plan at the same events it engaged with the London Boroughs.

Wider engagement

33. The GLA has sought to widen the audience it has previously engaged in the preparation of the London Plan.

Social Media

34. Throughout the consultation of the Mayoral Strategies (including the London Plan), the GLA have used social media through twitter and Talk London to reach out to a wider audience with a more diverse demographic to promote the strategies and engagement with them. In particular, as each strategic was being consulted upon; the majority of which were during the preparation of the London Plan, the links between policies within the strategies and the London Plan were highlighted.

New London Architecture

35. New London Architecture (NLA) is an independent forum for discussion, debate and information about architecture, planning, development and construction in the capital. The GLA regularly present at the NLA events and engage in debates. There were three events specifically organised to discuss early policy options and inform the development of the London Plan – one full day event in November 2016 and two large public evening debates in January 2017 and February 2018 – attended by over 1,000 each. Issues debated included where should London's growth take place? how should densification and design in housing be approached? how can better streets & public spaces be delivered? How to provide the right spaces to enhance London's economic activity? Details of the events can be:
- http://www.newlondonarchitecture.org/docs/nla_insight_report_web_final.pdf
 - <http://www.newlondonarchitecture.org/whats-on/events/2017/january-2017/the-big-debate>.
 - <http://newlondonarchitecture.org/whats-on/events/2018/february-2018/the-big-debate-2018>

Urban Design London

36. Urban Design London (UDL) is a not-for-profit organisation, founded to support London's built environment professionals. In conjunction with the GLA it ran a series of seven debates and consultative events from June to October 2016 to discuss key issues for the London Plan. Over 600 people attended the events, including representatives from all the London Boroughs as well as from 45 private sector organisations and 36 expert speakers. The specific details of these events

alongside the views and ideas of participants can be found here:
<http://www.urbandesignlondon.com/new-london-plan/>

Specific evidence base engagement

37. In the preparation of key evidence for the London Plan, the GLA has actively engaged relevant stakeholders from the private, public and community sectors.

Strategic Housing Land Availability Assessment

38. In preparing the Strategic Housing Land Availability Assessment (SHLAA) the GLA ran a series of engagement events over 2016 to discuss and get feedback on the proposed methodology and the six density research projects the GLA had undertaken to inform the SHLAA and London Plan policies. These events involved meetings for all London Boroughs, the Strategic Housing Market Partnership, and presenting at an ALBPO meeting.

39. Following these events, the GLA consulted on the draft SHLAA methodology (primarily focusing on the approach to large sites) for eight weeks from 23 November 2016 to 20 January 2017. A wide range of stakeholders were invited to comment. These included Wider South East Officer Working Group, Members of the Strategic Housing Market Partnership members. The GLA also presented the draft methodology at two meetings for all London Boroughs and the Strategic Housing Market Partnership during the consultation period. The consultation comments informed the final SHLAA methodology.

40. During 2017 there were a wide range of meetings with boroughs on SHLAA and system training and through providing guidance notes. The GLA then had one to one meetings with boroughs to discuss findings and results to ensure a robust study. The SHLAA 2017 report (EiP ref: NLP/HOU/001) provides more detail on these meetings.

Strategic Housing Market Assessment (SHMA)

41. In preparing the SHMA the GLA engaged with stakeholder groups to discuss the evidence base for the Plan at various stages of development. In particular, GLA officers presented and discussed work on the GLA's emerging demographic model and the SHMA with the Wider South East Officer Working Group on a number of occasions in 2016 and 2017:

- The development of the methodology for the SHMA was discussed with the Strategic Housing Market Partnership from initial presentations on the proposed approach inviting comments to discussion of the detailed methodology and views on scenario testing.
- The SHMA methodology was also discussed with Association of London Borough Planning Officers.
- GLA officers gave presentations on the SHMA at a technical seminar for Assembly Members (January 2018).
- 15 January 2018 GLA officers gave presentations on the SHMA at a technical seminar for Assembly Members

Affordable Housing and Viability SPG

42. The policies on affordable housing in the draft Plan were informed by the extensive engagement undertaken in the development of the Affordable Housing and Viability SPG. There were numerous meetings with boroughs (both officers and members), the development industry, agents and consultants and community representatives between May and November 2016 prior to the draft and as part of the consultation (November 2016 -February 2017). The initial meetings focused on potential approaches to increasing affordable housing delivery and speeding up the planning system – these discussions fed directly into the final approach. Over 130 responses were received to the consultation which were had regard to in the development of the final SPG.

Industrial Land Supply and Economy Study

43. London boroughs were engaged directly in the preparation of the study, including the sharing of draft GIS layers for verification and amendments. The draft and final study results were presented at ALBPO meetings (Nov 2015, Jan 2016, March 2016).

Industrial Land Demand Study

44. A series of workshops held with a range of stakeholders including London boroughs, wider south east planning authorities and businesses. Draft findings were presented and debated to ALBPO in October 2016.

London Office Policy Review

45. A series of workshops held with a range of stakeholders including London boroughs, wider south east planning authorities and businesses. Draft findings were presented to ALBPO in Oct 2016)

Employment Projections

46. London boroughs were engaged directly in the London Employment Sites Database – a key component of the borough level employment projections. Each borough was interviewed to discuss which sites to include in the database and to verify estimates of employment capacity and potential timing.

Town Centre Health Check

47. Boroughs were consulted in the methodology for the TCHC and were directly engaged town centre boundaries and verifying data, including the provision of local data. Draft findings presented and discussed at ALBPO meetings.

Annex A

Pre-Consultation Engagement on the London Plan

Date	Lead organisation or meeting title	Other organisations attending	subject/content of meeting	Category
26/01/2015	Mayor's Academic Forum meeting	Members of the Academic Forum - representatives from the boroughs, universities, private and voluntary sector student accommodation providers and students	Approach to delivering affordable student accommodation	Cross-Sector Stakeholder Forum
15/07/2015	London Plan review meeting with Historic England	Historic England and GLA officers	discussion of historic environment related policies and research in regard to the London Plan review	Prescribed Body
03/09/2015	Just Space	Members of Just Space	Industrial land supply presentation	Campaign Group
22/09/2015	ALBPO Policy Officers	London Borough planning officers	London Plan review Strategic Housing Market Assessment	London Boroughs Umbrella Group
29/09/2015	ALBPO Development Plans	London Borough planning policy team leaders	London Plan review Strategic Housing Market Partnership	London Boroughs Umbrella Group
10/11/2015	Strategic Housing Market Partnership meeting	London Borough planning officers, London Councils, London Forum members, Housing associations London Tenants Federation, Historic England, TfL, Just Space, London First	Overview of London Plan review, Current density policy Planned density research for London Plan review	Cross-Sector Stakeholder Forum
24/11/2015	ALBPO Development Plans	London Borough planning policy team leaders	London Plan review Industrial Land Supply Report and wider evidence base Wider South east collaboration	London Boroughs Umbrella Group
27/11/2015	NLA London Plan Charette	London Borough planning officers, private sector planners, policy makers,	Ideas for accommodating London's growth	Cross-Sector Stakeholder Forum

		developers, architects, community forums and academia		
27/11/2015	NLA - Re-inventing the London Plan: A charrette on the capital's future	London boroughs, developers, architects and urban design practitioners, amenity and campaign groups	All day charrette to inform thinking around the next iteration of the London Plan in the run up to a new Mayor	Cross-Sector Stakeholder Forum
11/12/2015	Wider South East Summit	Political Leaders and officers from the East of England, South East and London	Preparation for full review of the London Plan	Local Government (Wider South East)
13/01/2016	ALBPO Policy Officers	London Borough planning officers	London Plan review economy research projects	London Boroughs Umbrella Group
21/01/2016	ALBPO Development Plans	London Borough planning policy team leaders	London Plan review Industrial Land Supply Report and wider evidence base	London Boroughs Umbrella Group
26/01/2016	Energy / CO2 policy	Zero Carbon Hub	Emerging national policy and evidence and existing and potential energy policies for London	Cross-Sector Stakeholder Forum
26/01/2016	London Waste Planning Forum	Boroughs	Waste policy	London Boroughs
17/02/2016	Strategic Housing Market Partnership meeting	London Borough planning officers, London Councils, London Forum members, Housing associations London Tenants Federation, Historic England, TfL, Just Space, London First	Presentations and discussion on early findings of GLA six density research projects	Cross-Sector Stakeholder Forum
01/03/2016	ALBPO Development Plans	London Borough planning policy team leaders	London Plan review Industrial Land Supply Report	London Boroughs Umbrella Group

08/03/2016	New London Plan consultation workshop	Planners and wider development industry professionals in London	A series of Key note speeches followed by table discussion on the themes of: <ul style="list-style-type: none"> • Accommodating London's growth • Working in London • Climate Change and resilience • People and communities • Infrastructure • Living in London 	Cross-Sector Stakeholder Forum
10/03/2016	London Assembly Planning Committee	Assembly Planning Committee members and invited guests: GLA Strategic Planning Manager and Senior Strategic Planner; Director of South East England Councils; Chair of the Outer London Commission; and Regional Planning Advisor	Discussed the progress of developing more effective arrangements for co-ordinating strategic policy and infrastructure investment across London and the wider South East of England	Invited participants
16/03/2016	ALBPO Policy Officers	London Borough planning officers	London Plan review Industrial Land Supply Report, wider evidence base, upcoming SHLAA meeting	London Boroughs Umbrella Group
23/03/2016	GLA Strategic Access Panel meeting		Item 4a) draft London Plan event feedback	Cross-Sector Stakeholder Forum
07/04/2016	SHLAA London Boroughs meeting	London Borough planning officers	Presentations and discussions on the approach to the SHLAA and project timeline, GLA Density research projects.	Cross-Sector Stakeholder Forum
14/04/2016	London First	London First members economy focus group	London Plan Economic policy – general	Business Interest Umbrella Group
14/04/2016	RTPI Mayoral Series - London's environmental resilience	Planners and wider development and sustainability industry professionals in London	London's environmental resilience	Cross-Sector Stakeholder Forum
14/04/2016	London Healthy Urban Development Unit	Office of London CCGs	Discussed the need to include requirements for NHS	Professional Body

			provision in the new London Plan.	
26/04/2016	ALBPO Development Plans	London Borough planning policy team leaders	London Plan review Evidence base - SHLAA – call for sites, Industrial Land Supply Report	London Boroughs Umbrella Group
05/05/2016	London Healthy Urban Development Unit	Office of London CCGs	Discussed NHS provision in London, population growth, STPs, and potential content of the policy on health facilities.	Professional Body
12/05/2016	ALBPO Policy Officers meeting	London Borough planning policy officers	Industrial land supply presentation	London Boroughs Umbrella Group
17/05/2016	London Development Database Group SHLAA scoping meeting with	London Borough GIS and Planning data officers	Presentations and discussions on the approach to the SHLAA system.	London Boroughs Umbrella Group
18/05/2016	GLA Strategic Access Panel meeting		London Plan update	Cross-Sector Stakeholder Forum
18/05/2016	SEGRO		Industrial land policy	Planning and Development Business
07/06/2016	UDL (Urban Design London)	UDL members: borough officers, councillors, private sector built environment practitioners, housing associations, metropolitan policy, government agencies and advising organisations (full list of attendees in meeting notes)	Policy Symposium on Built Environment Policies	Cross-Sector Stakeholder Forum
07/06/2016	Historic England & GLA liaison meeting	Historic England and GLA officers	HE research to support engagement on the London Plan. Update on London Plan development	Statutory Consultee
09/06/2016	London Environmental Coordinators Forum	London borough sustainability leads	Zero carbon and carbon off-setting	London Boroughs Umbrella Group

21/06/2016	ALBPO Development Plans meeting	London Borough planning policy team leaders	Hotel demand study presentation	London Boroughs Umbrella Group
27/06/2016	London Healthy Urban Development Unit	Office of London CCGs	Discussed information on health infrastructure to be included in London Plan and timelines for drafting policy and supporting text.	Professional Body
28/06/2016	UDL	UDL members (see above for details)	Policy Symposium on Tall Buildings and View Management Policies	Cross-Sector Stakeholder Forum
01/07/2016	Zero carbon implementation	London borough planning sustainability and sustainability leads	To discuss the implementation of the London Plan zero carbon policy to inform revised policy.	London Boroughs Umbrella Group
05/06/2016	Sport England - Social Infrastructure Planning - Sports Facilities.		To discuss the current London Plan sports evidence base and options for updates. Approaches to the new London Plan sports policy and the state of Playing Pitch Strategies.	Government Agency
30/06/2016	TfL/GLA/Highways England Strategy Meeting		Discuss the work Highways England has underway to develop a strategic economic growth plan looking at the role of the Strategic Road Network and Highways England in supporting economic growth across the country	Government Agency
13/07/2016	UDL	UDL members (see above for details)	Ways to Intensify Suburbs	Cross-Sector Stakeholder Forum
14/07/2016	ALBPO Policy Officers meeting	London Borough planning policy officers	London Plan review Evidence base - SHLAA – call for sites, Hotel need Study, Office review Study, Industrial land need study	London Boroughs Umbrella Group

			Update on the new mayor's priorities	
18/07/2016	Wider South East Political Steering Group	Political Leaders from the East of England, South East and London	London Plan Review and drivers for change	Local Government (Wider South East)
19/07/2016	London Waste Planning Forum	Boroughs, Utilities	Waste policy	London Boroughs Umbrella Group
22/07/2016	CBRE	Businesses, Developers	SME workspace issues	Planning and Development Business
26/07/2016	Zero carbon homes and DCLG		To discuss the implementation of the London Plan zero carbon policy to inform potential future approach	Central Government
03/08/2016	Approach to affordable housing and viability-round table	Borough officers and Lead Members	To discuss how the Mayor's manifesto commitment of increasing affordable housing could be achieved.	London Boroughs Umbrella Group
04/08/2016	Approach to affordable housing and viability - round table	Private sector (housing developers and agents/consultants).	To discuss how the Mayor's manifesto commitment of increasing affordable housing could be achieved.	Private Sector
11/08/2016	Approach to affordable housing and viability-round table	Borough officers and Lead Members	To discuss how the Mayor's manifesto commitment of increasing affordable housing could be achieved.	London Boroughs Umbrella Group
28/08/2016	Approach to affordable housing and viability -round table	Private sector (housing developers and agents/consultants).	To discuss how the Mayor's manifesto commitment of increasing affordable housing could be achieved.	Private Sector
09/09/2016	Wider South East Group		GLA's demographic modelling	Local Authorities
06/09/2016	ALBPO Development Plans meeting	London Borough planning policy team leaders	Employment projections presentation	London Boroughs

				Umbrella Group
07/09/2016	London Healthy Urban Development Unit	Office of London CCGs	Discussed background information to support London Plan policy on health facilities. Reviewed data on indicative number of GPs needed per CCG over the next 10 years.	Professional Body
16/09/2016	Federation of Small Businesses	FSB members	SMEs and Affordable workspace	Business Interest Umbrella Group
16/09/2016	London First members – economy focus group	London First members economy focus group	Affordable workspace	Business Interest Umbrella Group
19/09/2016	London Forum meeting	London Forum members	Town centres presentation	Campaign Group
19/09/2016	Historic England & GLA liaison meeting	Historic England and GLA officers	Cultural Infrastructure Plan Creative Enterprise Zones 'Towards' the London Plan & full review Opportunity Areas Heritage Action Zones HE Expert Panel Archaeology Heritage At Risk	Statutory Consultee
21/09/2016	West London Economic Prosperity Board		London Plan policy issues, skills and devolution	London Boroughs Umbrella Group
21/09/2016	Historic England Expert Panel Roundtable	Historic England, GLA, The Guardian - CHAIR London Advisory Committee members, Central Consultancy, British Land, Islington Council	Presentation of HE research for the London Plan and discussion of: 1) identification of key strategic heritage issues that the Mayor should address in the new London Plan and related strategies, and 2) a broad delivery framework in which	Cross-Sector Stakeholder Forum

			to develop a positive proactive strategy for London's historic environment	
22/09/2016	UDL	UDL members (see above for details)	Policy Symposium on Density Policies and the Density Matrix	Cross-Sector Stakeholder Forum
23/09/2016	London Plan Connectivity Workshop	Operators, development sector representatives, local authorities and technical experts	Explore the scope for changes to the current policy position with specific focus on: considering digital connectivity requirements of new development; encouraging and coordinating investment in areas of need; encouraging the dissemination of information on coverage; encouraging the consideration of assets that may facilitate deployment to support future technologies	Cross-Sector Stakeholder Forum
27/09/2016	Sport England - Social Infrastructure Planning - Sports Facilities.		Review of Sports Halls in London undertaken by Sports England to support the evidence base of the new London Plan sports policy.	Government Agency
30/09/2016	Affordable Housing and Viability approach development	A series of meetings attended by borough officers.	To discuss proposals for the threshold approach to viability in detail with small groups of borough officers to inform its development.	London Boroughs Umbrella Group
04/10/2016	Physical activity for health network – led by London Sport		The impact of the London Plan on levels of physical activity in London. Discussion on the drafting of the new London Plan.	Campaign Group
11/10/2016	London First – Retail Group		Town centres and retail	Business Interest

				Umbrella Group
11/10/2016	UDL	UDL members (see above for details)	Policy Symposium on Green Infrastructure Policies	Cross-Sector Stakeholder Forum
12/10/2016	Wider South East Political Steering Group	Political Leaders from the East of England, South East and London	Towards new Wider South East policy	Local Government (Wider South East)
13/10/2016	London Gypsy and Traveller Forum run by London Gypsies and Travellers		London Gypsy Traveller Unit Planning Seminar: policy recommendations and next steps	Campaign Group
13/10/2016	UDL	UDL members (see above for details)	13th October 2016 – What Should the London Plan Say About Design?	Cross-Sector Stakeholder Forum
13/10/2016	ALBPO Policy Officers meeting	London Borough planning policy officers	London Plan review Evidence base - SHLAA – call for sites, Hotel need Study, Office review Study, Industrial land need study Update on the new mayor's priorities	London Boroughs Umbrella Group
17/10/2016	Energy event	London borough sustainability leads	To discuss implementation of existing policy, and evidence base to inform revised policy	London Boroughs Umbrella Group
19/10/2016	GLA Strategic Access Panel meeting		Item 3) London Plan policy update and SPG	Cross-Sector Stakeholder Forum
25/10/2016	London Wildlife Trust and GiGL	Boroughs, Thames Water, Environment Agency	Review of the London Plan habitat targets	Cross-Sector Stakeholder Forum
31/10/2016	A City for All Londoners consultation	All stakeholders - industry experts and private and public-sector stakeholders including local boroughs, developers, think tanks, charities, consultancies, community groups and others	Launch event	Cross-Sector Stakeholder Forum

02/11/2016	A City for All Londoners consultation - Accommodating Growth workshop	All stakeholders - industry experts and private and public-sector stakeholders including local boroughs, developers, think tanks, charities, consultancies, community groups and others	Accommodating Growth workshop 1 What is Good Growth 2 Spatial approach to Good Growth 3 Intensifying some suburban areas 4 More intelligent use of industrial land 5 Town Centres and High Streets 6 Opportunity Areas, Intensification Areas and other growth area designations 7 The importance of the Central Activities Zone 8 Development corridors in London and the South East 9 Intensifying some suburban areas 10 Town Centres and High Streets	Cross-Sector Stakeholder Forum
04/11/2016	Affordable housing and viability round table	Community group representatives	Meeting to discuss the emerging approach to affordable housing and viability	London Boroughs Umbrella Group
09/11/2016	A City for All Londoners consultation - Transport workshop	All stakeholders - industry experts and private and public-sector stakeholders including local boroughs, developers, think tanks, charities, consultancies, community groups and others	Transport focused workshop 1- Strategic priorities for a growing city workshop 2 – A spatial approach	Cross-Sector Stakeholder Forum
09/11/2016	Wider South East Officer Working Group	Strategic planning officers from the East of England, South East and London	Towards new Wider South East policy	Local Government (Wider South East)

11/11/2016	A City for All Londoners consultation - An inclusive city workshop	All stakeholders - industry experts and private and public-sector stakeholders including local boroughs, developers, think tanks, charities, consultancies, community groups and others	An Inclusive City Workshop Programme 1 Social integration and inclusion 2 Social mobility, equality and fairness 3 Community, active citizenship and participation 4 Healthy environments 5 Social infrastructure 6 Activating, managing and maintaining public spaces 7 Culture 8 Designing inclusive public spaces 9 Health inequalities 10 Inclusive design	Cross-Sector Stakeholder Forum
15/11/2016	London Assembly Planning Committee	Assembly Planning Committee members and invited guests: Deputy Mayor for Planning, Regeneration and Skills; Deputy Mayor for Housing and Residential Development; GLA Strategic Planning Manager, Managing Director of First Base; Director of Sustainability at Useful Projects & Sustainability Lead at OPDC	Discussed the Mayoral consultation on the first stages of the review of the London Plan, which was A City for All Londoners consultation document	
16/11/2016	UDL London Plan series meeting	UDL members (see earlier UDL meeting for details)	What Should the London Plan Say About Design Workshop	Cross-Sector Stakeholder Forum
16/11/2016	A City for All Londoners consultation - Environment Workshop	All stakeholders - industry experts and private and public-sector stakeholders including local boroughs, developers, think tanks, charities,	Environment Workshop Programme 1 Zero carbon and keeping within 1.5 degrees 2 Air quality post	Cross-Sector Stakeholder Forum

		consultancies, community groups and others	2020 – zero emission 3 Good growth 4 Transition to the low carbon economy 5 Natural capital 6 Resilient London 7 Waste – recycling and the circular economy 8 Behaviour change	
21/11/2016	A City for All Londoners consultation - Housing Workshop	All stakeholders - industry experts and private and public-sector stakeholders including local boroughs, developers, think tanks, charities, consultancies, community groups and others	Housing Workshop Programme 1 Affordable housing delivery and viability 2 Affordable housing tenures 3 Increasing and accelerating housing delivery 4 Build to rent 5 Residential design quality standards 6 Residential density 7 Meeting the range of housing needs 8 Mixed and balanced communities 9 Suburban Intensification 10 Estate regeneration	Cross-Sector Stakeholder Forum
22/11/16	Strategic Housing Market Partnership		Proposed approach to SHMA	Cross-Sector Stakeholder Forum
23/11/2016	A City for All Londoners consultation - Economy Workshop	All stakeholders - industry experts and private and public-sector stakeholders including local boroughs, developers, think tanks, charities, consultancies, community groups and others	Economy workshop 1 Global competitiveness 2 Further education and skills 3 Opportunities for all 4 Support for SMEs, start-ups and growth 5 Affordable Workspace 6 Night time economy 7 Sectors 8 Devolution	Cross-Sector Stakeholder Forum

			9 Cultural and creative workspace 10 Infrastructure	
30/11/2016	GLA Strategic Access Panel meeting		Shared space Public realm Public toilets	Cross-Sector Stakeholder Forum
01/12/2016	ALBPO Development Plans and Policy Officers	London borough planning officers	Affordable workspace	London Boroughs Umbrella Group
01/12/2016	Strategic Housing Market Partnership meeting	London Borough planning officers, London Councils, London Forum members, Housing associations London Tenants Federation, Historic England, TfL, Just Space, London First	Presented and discussed the draft methodology and outline the project timescales for the SHLAA and SHMA	Cross-Sector Stakeholder Forum
02/12/2016	London aggregates working party	representatives from the aggregates industry, local authorities	London Local Aggregate Assessment (LAA) 2016 and update on London Plan preparation	Cross-Sector Stakeholder Forum
02/12/2016	Mayor's Academic Forum meeting	Members of the Academic Forum - representatives from the boroughs, universities, private and voluntary sector student accommodation providers and students	Method for projecting for number of higher education students in London over plan period. Discussion of what percentage of students should be accommodated in PBSA Discussion of affordable student accommodation policy for next	Cross-Sector Stakeholder Forum

			London Plan Discussion of university led regeneration	
09/12/2016	Wider South East Summit	Political Leaders and officers from the East of England, South East and London	Shaping key London Plan issues	Local Government (Wider South East)
12/12/2016	Waterways Policies Workshop	Key waterways stakeholders including former London Waterways Commission representatives and London boroughs	Future of the London Plan's suite of Blue Ribbon Network policies	Cross-Sector Stakeholder Forum
15/12/2016	GLA Energy guidance workshop	AECOM	Update the existing guidance and discussion of potential future energy / CO2 policy	
09/01/2017	Westminster Property Association		Affordable workspace	Business Interest Umbrella Group
10/01/2017	Historic England & GLA liaison meeting	Historic England and GLA officers	<ol style="list-style-type: none"> 1. London Plan review – heritage policies and review timetable 2. Historic England's response to A City for All Londoners 3. Protected vista from King Henry VIII's Mound to St Paul's Cathedral 4. Westminster WHS - UNESCO/ICOMOS reactive mission 	Statutory Consultee
17/01/2017	ALBPO Development Plans meeting	London Borough planning policy team leaders		London Boroughs Umbrella Group
20/01/2017	London Plan review meeting with Historic England	Historic England and GLA officers	Development of London Plan policies	Statutory Consultee

25/01/2017	London Waste Planning Forum	Boroughs, Utilities	Waste Policy	London Borough
02/02/2017	SEGRO		Industrial land seminar	Planning and Development Business
02/02/2017	Consultation on affordable housing and viability SPG	Community group representatives	Affordable Housing and Viability SPG	Cross-Sector Stakeholder Forum
09/02/2017	ALBPO Policy Officers meeting	London Borough planning policy officers		London Boroughs Umbrella Group
10/02/2017	London First	London First members	Affordable Housing and Viability SPG and Affordable Homes Programme 2016-21 Funding Guidance	Business Interest Umbrella Group
10/02/2017	London Authorities Viability Group	London Borough planning, housing and surveying officers	Affordable Housing and Viability SPG and Affordable Homes Programme 2016-21 Funding Guidance	London Boroughs Umbrella Group
21/02/2017	Wider South East Officer Working Group	Strategic planning officers from the East of England, South East and London	Further draft Wider South East policies for discussion	Local Government (Wider South East)
22/02/2017	Just Space		SHMA methodology	Community Umbrella Group
28/02/2017	London Plan Review Session: inclusive design	Access Association and National Register of Access Consultants members	Existing LP policies relating to inclusive design, lifetime neighbourhoods, disabled persons parking	Cross-Sector Stakeholder Forum
01/03/2017	Natural Environment Stakeholder Group	Wide variety of green infrastructure and natural environment stakeholders including statutory agencies (Natural England, Environment Agency, Forestry Commission) and NGOs including:	Presentation and workshop on draft London Environment Strategy which included draft proposals for changes to London Plan policies on green	Cross-Sector Stakeholder Forum

		London Wildlife Trust, Woodland Trust, Thames 21, Sustrans, Canals and Rivers Trust, and representatives from boroughs, Lea Valley Regional Park Authority and Royal Parks Agency.	infrastructure and natural environment.	
06/03/2017	Urban Design London	Planning officers, members, registered providers	Affordable housing and viability	Cross-Sector Stakeholder Forum
08/03/2017	House Builder's Federation		Affordable Housing and Viability SPG	Business Interest Umbrella Group
14/03/2017	ALBPO Development Plans meeting	London Borough planning policy team leaders	SHMA methodology	Cross-Sector Stakeholder Forum
14/03/2017	London Assembly Planning Committee	Assembly Planning Committee members and invited guests: GLA Strategic Planning Manager and Senior Strategic Planner; Director of South East England Councils, , GLA, Chair of the Outer London Commission, and Regional Planning Advisor	Discuss the issue of increasing housing density through the London Plan and related evidence base reports on Density.	
28/03/2017	London Plan Workshop: Children and Play & launch of the Alliance for Childhood - London forum	London Play, Physical Activity for Health Network, Play England, Arup, SCD Architects, Outdoor People, RTIP, Child Poverty Action Group, Assemble Studio and London borough planning policy staff.	Discuss the draft London Plan play policy and opportunities to improve children's play and inclusion in the city.	Cross-Sector Stakeholder Forum
31/03/2017	Wider South East Political Steering Group	Political Leaders from the East of England, South East and London	London Plan Review - Wider South East policies - for discussion	Local Government (Wider South East)
06/04/2017	London First	London First members	Workspace	Business Interest Umbrella Group

13/04/2017	London Councils	London Councils, and London borough Heads of Regeneration	Economy, workspace and regeneration	London Boroughs Umbrella Group
18/04/2017	Workspace Providers Board		Affordable workspace	Internal?
19/04/2017	LB Greenwich	Planning and housing officers	Affordable housing and viability	London Borough
20/04/2017	ALBPO Policy Officers meeting	London Borough planning policy officers		London Boroughs Umbrella Group
26/04/2017	London Waste Planning Forum	Boroughs, Utilities	Waste	London Boroughs
05/05/2018	Just Space		Environment issues including, water, green infrastructure, air quality	Campaign Group
09/05/2017	British Property Federation	Roundtable event – industry stakeholders	Industry and logistics	Business Interest Umbrella Group
09/05/2017	Technical Workshop on London Plan water policies	Water management and flood risk stakeholders	Discuss potential technical contribution towards the preparation of the water-related policies of the new London Plan	Cross-Sector Stakeholder Forum
15/05/2017	Just Space	London Plan / Economic Development Strategy engagement	Workspace	Campaign Group
15/05/2017	Strategic Housing Market Partnership		SHMA methodology	Cross-Sector Stakeholder Forum
16/05/2017	ALBPO Development Plans	London borough planning officers	Offices, industry and town centres	London Boroughs Umbrella Group
16/05/2017	ALBPO Development Plans meeting	London Borough planning policy team leaders		London Boroughs Umbrella Group
17/05/2017	GLA – Build to Rent	Build to Rent providers	Build to rent affordable housing and obligations	Cross-Sector Stakeholder Forum
16/05/2017	East of England RTAB		Waste	Wider South East

17/05/2017	GLA Inclusive Design and Access Panel (formerly Strategic Access Panel)		residential disabled persons parking and London Plan policy approach	Cross-Sector Stakeholder Forum
17/05/2017	JLL, build to rent viability roundtable	Build to Rent providers	Build to rent viability	Cross-Sector Stakeholder Forum
18/05/2017	London Authorities Viability Group	London Borough planning, housing and surveying officers	Affordable Housing and Viability SPG	London Boroughs Umbrella Group
25/05/2017	Urban Design London	Planning officers, Members, Registered Providers, Developers	Affordable housing and viability	Cross-Sector Stakeholder Forum
25/05/2017	Westminster City Council	Planning officers	Economy, housing, transport and environment	London Borough
02/06/2017	London Plan review meeting with Historic England	Historic England and GLA officers	Development of London Plan policies	Government Agency
03/06/2017	Borough officers workshop on MTS	London Borough Officers, City of London	Update on London Plan	London Borough
15/06/2017	ALBPO Policy Officers meeting	London Borough planning policy officers	Update on London Plan	London Boroughs Umbrella Group
15/06/2017	Newham Council	Planning officers	Industrial land	London Borough
15/06/2017	ODPC - Built Environment Access Panel (BEAP)		London Plan update and Inclusive Design	
19/06/2017	Wider South East Officer Working Group	Strategic planning officers from the East of England, South East and London	Update on draft Wider South East policies, SHMA methodology and demography model	Local Government (Wider South East)
20/06/2017	London Councils TEC		Provided update on publish draft MTS and relevant implications policy options for the London Plan	London Boroughs Umbrella Group
23/06/2017	London First	London First Members	Development viability and affordable housing	Business Interest Umbrella Group

30/06/2017	Planning Officers Society	London Planning Officers	Affordable housing and development viability SPG	Professional Body
04/07/2017	Planning and Development Advisory Forum	London First Members	Discussion of emerging policy approaches	Business Interest Umbrella Group
11/07/2017	ALBPO Development Plans meeting	London Borough planning policy team leaders		London Boroughs Umbrella Group
11/07/2017	London Assembly Regeneration Committee	Discussion with the invited guests (including GLA Planning)	Town centres	Professionals
12/07/2017	London First	London First Members	Affordable Housing and Viability SPG and emerging London policies	Business Interest Umbrella Group
13/07/2017	South East RTAB		Waste	WSE
14/07/2017	London First / Westminster Property Association	London First members / WPA	London Plan roundtable	Business Interest Umbrella Group
14/07/2017	Mayor's Academic Forum meeting	Members of the Academic Forum - representatives from the boroughs, universities, private and voluntary sector student accommodation providers and students	Methodology for projecting HE student numbers to be used in new London Plan Draft policy text for student accommodation in London Plan	Cross-Sector Stakeholder Forum
18/07/2017	Future of London	Future of London Members	Affordable housing and viability	Professional Body
18/07/2017	New London Architecture	NLA working group	Town centres	Professional Body
18/07/2017	London Waste Planning Forum	Boroughs / Utilities	Waste	Boroughs
21/07/2017	Wider South East Political Steering Group	Political Leaders from the East of England, South East and London	Update on London Plan - Wider South East policies	Local Government (Wider South East)
26/07/2017	London Industry and Logistics Sounding Board		Industrial land	Cross-Sector Stakeholder Forum
17/08/2017	Barking & Dagenham	Planning officers	Industrial land	London Borough

17/08/2017	Discussions with Tower Hamlets on its Local Plan		General update on the evidence base and potential policy directions to help inform the latter stage of the development of TH's draft Local Plan	London Borough
17/08/2017	London First	London First members	Industrial land	Business Interest Umbrella Group
21/08/2017	Travelodge		Hotels and accessible hotel bedrooms	Planning and Development Business
23/08/2017	London Plan review meeting with Historic England	Historic England and GLA officers	Development of London Plan policies	Government Agency
29/08/2017	London Industry and Logistics Sounding Board		Industry land	Cross-Sector Stakeholder Forum
05/09/2017	Wider South East Officer Working Group	Strategic planning officers from the East of England, South East and London	London Plan and potential willing partners,	Local Government (Wider South East)
07/09/2017	ALBPO Policy Officers meeting	London Borough planning policy officers		London Boroughs Umbrella Group
07/09/2017	London Assembly Planning Committee	Assembly Planning Committee members and invited guests: Deputy Mayor for Planning, Regeneration and Skills; GLA Senior Strategic Planner; Chief Executive at West London Business; City Director at Siemens Plc; Professor at London Metropolitan University; Partnership Development Director at SEGRO; Asset Management and Acquisitions Associate at Capital Industrial; Chief Executive at	Industrial land: Discussed Mayor's developing policy approach to managing the supply of industrial land in London,	

		Truman's Breweries; and Technical Director at Karakusevic Carson Architects.		
13/09/2017	London First	London First members	Town centres and retail	Business Interest Umbrella Group
14/09/2017	London Authorities Viability Group	London Borough planning, housing and surveying officers	Affordable Housing and Viability SPG	London Boroughs Umbrella Group
15/09/2017	London Energy Transformation Initiative (LETI) workshop	Developers, local authorities and climate change/sustainability consultants	Workshop groups focussing on the approach to various aspects of energy in the London Plan	Cross-Sector Stakeholder Forum
20/09/2017	Thames and Waterways Forum	London Councils, TfL , PLA, Boroughs, London First,	Waterways	Cross-Sector Stakeholder Forum
21/09/2017	CLG Build to Rent committee	Build to rent providers	Build to rent, affordable housing and other obligations	Central Government
26/09/2017	ALBPO Development Plans meeting	London Borough planning policy team leaders		London Boroughs Umbrella Group
27/09/2017	Early Local Plan discussions with Islington		General update on the evidence base and potential policy directions to help inform the development of Islington's draft Local Plan	London Borough
28/09/2017	London Residential and Viability Conference	Developers, registered providers, consultants, planning officers	Affordable Housing and Viability SPG and London Plan policies	Cross-Sector Stakeholder Forum
28/09/2017	Retirement Housing Group Conference 2017	Retirement housing group- local authority representatives and retirement housing providers	Specialist older persons housing and accessible and adaptable housing	Cross-Sector Stakeholder Forum

03/10/2017	Alliance for Childhood forum	Representatives from local authorities, play professionals, academics	Discussion around what makes a 'child friendly city'	Cross-Sector Stakeholder Forum
04/10/2017	Planning Issues for Housing conference	Developers, consultants, planning officers and lawyers	Affordable housing and viability	Cross-Sector Stakeholder Forum
10/10/2017	Association of Convenience Stores		Town centres and retail	Business Interest Umbrella Group
12/10/2017	London First, Places for People	DCLG, London First members	Build to rent, affordable housing and planning obligations	Cross-Sector Stakeholder Forum
13/10/2017	LB Havering	Planning officers	Development viability and affordable housing	London Borough
17/10/2017	Planning and Development Advisory Forum	London First Members	Overview and discussion of relevant London Plan Policies.	Business Interest Umbrella Group
19/10/2017	London Waste Planning Forum	London Boroughs/ Utilities	Waste policy and links between London Environment Strategy and London Plan	Boroughs
19/10/2017	London Industry and Logistics Sounding Board		Industry and Logistics	Cross-Sector Stakeholder Forum
20/10/2017	Tate & Lyle Sugars		Industrial land	Planning and Development Business
02/11/2017	ALBPO Policy Officers meeting	London Borough planning policy officers		London Boroughs Umbrella Group
08/11/2017	LB Redbridge		Development viability and affordable housing	London Borough
15/11/2017	Telford Homes		Affordable housing and viability	Planning and Development Business
16/11/2017	Natural England Workshop	stakeholders	Green infrastructure	Stakeholders
21/11/2017	ALBPO Development Plans meeting	London Borough planning policy team leaders		London Boroughs Umbrella Group

23/11/2017	SHLAA London Boroughs meeting	London Borough planning officers	Presented and discussed the draft methodology and outline the project timescales for the SHLAA and SHMA	London Boroughs Umbrella Group
24/11/2017	London SHLAA methodology and findings	Borough planners	To present the SHLAA	London Boroughs Umbrella Group
29/11/2017	GLA Inclusive Design and Access Panel (formerly Strategic Access Panel)		The new draft London Plan	Cross-Sector Stakeholder Forum

Annex B Local Plan and Opportunity Areas Planning Framework Meetings

1. Below sets out a list of the meetings with London boroughs between 2016 and 2017 in regards to engagement and collaboration of borough Local Plan and Opportunity Area Planning Frameworks.

Local Plan

February 2017

- LB Richmond - Local Plan. Main issues discussed St Mary's site & Metropolitan Open Land.

March 2017

- Southwark – Old Kent Road AAP – regular meetings to resolve approach to industrial land and phasing.
- Lewisham – Local Plan – Old Kent Road and New Cross and Lewisham working group

April 2017

- LB Newham - Local Plan – early discussions
- LB Southwark - Old Kent Road AAP – industrial land and town centres

May 2017

- LB Lewisham – Local Plan - Old Kent Road and New Cross and Lewisham working group
- LB Newham Local Plan – SHLAA, housing numbers, Royal Docks
- RB Westminster – early discussions on Local Plan, direction of London Plan
- LB Richmond – Local Plan - St Mary's site & Metropolitan Open Land.

June 2017

- LB Redbridge EiP – main issues – Green Belt
- LB Lewisham – Local Plan - Old Kent Road and New Cross and Lewisham working group

July 2017

- LB Lewisham – Local Plan - Old Kent Road and New Cross and Lewisham working group
- LB Croydon – main modifications discussion

August 2017

- LB Lewisham – Local Plan – early discussions
- RB Kensington and Chelsea – Local Plan Examination housing target following Grenfell
- LB Tower Hamlets – pre Local Plan consultation update (eg housing numbers, OAs, waste, tall buildings, housing mix)
- LB Havering – meeting with Basildon regarding Havering housing target and the role of the London Plan

Sept 2017

- OPDC - Housing, employment, update on London Plan
- LB Havering –car parking standards and transport issues
- LB Southwark – New Southwark Plan - update and range of policy issues, including industrial linked to Old Kent Road, Canada Water
- LB Islington – early discussions on direction of new London Plan and a new Islington Local Plan - housing numbers, small sites, employment
- LB Richmond’s EiP re: St Mary’s site and MoL designation

Oct 2017

- LB Croydon – conformity and loss of GB for school site, hot food takeaways
- LB Havering - South Essex and housing numbers

Opportunity Area Planning Framework

New Southgate

- LB Enfield/ LB Barnet/ LB Haringey – quarterly meetings. Main issues discussed related to possible crossrail 2 alignments and the impact of potential growth capacity scenarios. These discussions were indicative given the early stages of the project but have informed local plan development.

Isle of Dogs

- LB Tower Hamlets – bi-monthly meetings. Main issues discussed and resolved related to the approach to retaining and enhancing office locations in the IoD OA, delivering physical and social infrastructure to support potential growth scenarios and agreeing an approach to engaging with local stakeholders and community groups.

Thamesmead and Abbey Wood

- LB Bexley and LB Greenwich – bi-monthly meetings. Main issues discussed relate to potential growth scenarios and the necessary thing requirements for social and physical infrastructure to support growth. The focus has been on facilitating delivery of river crossings and resolving a policy compliant approach to industrial intensification.

Bexley Riverside

- LB Bexley – bi-monthly meetings. Main issues discussed relate to potential growth scenarios and the necessary requirements for social and physical infrastructure to support this growth. The focus has been on facilitating delivery of river crossings and resolving a policy compliant approach to industrial intensification. This work is ongoing as is informing the development of the Bexley Local Plan.

Royal Docks and Beckton Riverside

- LB Newham – quarterly meetings. Main issues discussed relate to development proposals for key sites, delivery of supporting infrastructure, ensuring industrial intensification is delivered while optimising housing delivery.

Kingston

- RB Kingston – quarterly meetings. Main issues discussed and resolved related to development potential, delivery of infrastructure and support to carry out infrastructure studies to inform future local plan development.

Great West Corridor

- LB Hounslow – quarterly meetings. Main issues discussed and resolved related to the proposed approach to industrial land intensification, town centres, infrastructure delivery and green belt.

Old Kent Road

- LB Southwark and LB Lewisham – monthly meetings. Main issues discussed and resolved related to the delivery of supporting infrastructure in-line with growth scenarios, development of town centres, industrial land intensification and major transport infrastructure delivery.

Lee Valley

- LB Enfield/ LB Waltham Forest/ LB Haringey/ LB Hackney – quarterly meetings. The key issue related to agreeing an approach to development capacity which can deliver optimised housing growth while ensuring the supporting infrastructure is provided. Industrial intensification and ensuring the

protection and enhancement of natural assets is key. The OAPF is ongoing pending a decision on CR2.

Euston

- LB Camden – bi-monthly meetings. Main issues discussed related to the emerging master plan, station design and delivery. This work is ongoing.

Canada Water

- LB Southwark – quarterly meetings. Main issues discussed and resolved were design related as the masterplan has emerged.

Charlton Riverside

- RB Greenwich -ad hoc meetings as appropriate related to development of SPD.

Annex C

List of London Plan formal consultation events

The list below is of the different events the GLA organised and presented at during the statutory consultation period for the London Plan between November 2017 and March 2018.

Consultation start / end
Launch event
GLA event
Assembly Committee Meeting

Event	Date
Launch of Draft LP (Mayor)	Wednesday 29th November
GLA's Inclusive Design and Access Panel	Wednesday 29th November
New London Architecture - New York / London Seminar	Thursday 30th November
Royal Town Planning Institute (RTPI) Conference	Thursday 30th November
ALBPO	Thursday 30th November
Consultation Starts	Friday 1st December
Launch of Draft LP (City Hall)	Friday 1st December
New London Sounding Board	Friday 1st December
South East Strategic Leaders	Friday 1st December
Launch of Draft LP 2 (City Hall)	Friday 1st December
London Environment Director's Network (LEDNet)	Monday 4th December
Healthy Place Network	Monday 4th December
Maritime Greenwich World Heritage Site Steering and Executive Group	Monday 4th December
West London Chief Planning Officers Group	Monday 4th December
Water Advisory Group	Monday 4th December
Thames and London Waterways Forum – Freight and Development Working Groups	Tuesday 5th December
London Councils Leaders Committee	Tuesday 5th December
London First	Wednesday 6th December
Essex Planning Officer Association	Thursday 7th December

Assembly Member Briefing	Thursday 7th December
ALBPO Policy Officers Group - Housing	Thursday 7th December
London Environment Coordinators Forum (LECF)	Thursday 7th December
Western Riverside Waste Authority Liaison Meeting	Friday 8th December
Wider South East Officer Working Group	Friday 8th December
CAZ borough planning officers	Monday 11th December
TfL Meeting	Tuesday 12th December
Second Port of London Infrastructure Group	Tuesday 12th December
London Industry and Logistics Sounding Board	Wednesday 13th December
British Property Federation London Plan Event	Wednesday 13th December
East & South East London Sub-regional panel officers meeting	Thursday 14th December
London Fire Brigade Working Group	Friday 15th December
Infrastructure High Level Group - First Meeting	Monday 18th December
East London Waste Authority (ELWA)	Tuesday 19th December
Energy Policies - Borough Workshop	Monday 8th January
Merton (Sub-Regional)	Tuesday 9th January
Lichfields	Wednesday 10th January
Wider South East London Plan Consultation meeting in Hertfordshire	Wednesday 10th January
Women in Planning - Unlocking delivery through good placemaking and design – The future of planning as a creative and collaborative endeavour	Wednesday 10th January
UDL session on the London Plan	Thursday 11th January
East of England Infrastructure and Growth Group	Thursday 11th January
Steering Group Meeting of the Thames and London Waterways Forum (TLWF)	Thursday 11th January
Enfield (Sub-regional)	Friday 12th January
London Sustainable Development Commission (LSDC)	Friday 12th January
London Plan Access and Inclusion Professionals Meeting	Monday 15th January
London School of Economics (LSE)	Monday 15th January
London First - Building London Conference	Tuesday 16th January
South East Waste Planning Advisory Group (SEWPAG)	Tuesday 16th January
London Climate Change Partnership (discussing LP evidence base)	Tuesday 16th January

Brent, West London Alliance (Sub-Regional)	Wednesday 17th January
London Assembly Environment Committee	Wednesday 17th January
Registered Providers Briefing - Housing and Land	Wednesday 17th January
Business Meeting (City Hall)	Thursday 18th January
Borough Meeting 1 (City Hall)	Friday 19th January
LWARB/GLA Waste Industry Event	Friday 19th January
Community Event (weekend) (City Hall)	Saturday 20th January
London Assembly Planning Committee	Monday 22nd January
London Energy Transformation Initiative (LETI)	Monday 22nd January
East of England Waste Technical Advisory Board (EoE WTAB)	Tuesday 23rd January
London Assembly Housing Committee	Tuesday 23rd January
London Authorities Viability Group	Tuesday 23rd January
Utility and Infrastructure Providers	Wednesday 24th January
London Geodiversity Partnership	Wednesday 24th January
UCL	Wednesday 24th January
London Waste Planning Forum (LWPF)	Wednesday 24th January
Cross River Partnership (CRP) and Association of Town and City Management (ATCM)	Wednesday 24th January
Borough Meeting 2 (City Hall)	Thursday 25th January
City & Westminster Property Associations (CWA / WPA)	Thursday 25th January
The Housing Forum's Development Partnership Forum	Friday 26th January
Planning Officers Society (POS) / ALBPO (joint meeting)	Friday 26th January
Wider South East Summit	Friday 26th January
LEAP	Monday 29th January
London Forum	Monday 29th January
Thames Strategy Kew - Chelsea - Steering Group meeting	Tuesday 30th January
London Sport Relationship Management team meeting	Tuesday 30th January
London Physical Activity for Health Network	Wednesday 31st January
British Retail Consortium	Wednesday 31st January
London Health and Well Being Boards (HWB) Policy Leads Meeting	Thursday 1st February
Bexley (Sub-Regional)	Thursday 1st February
Queen Elizabeth Olympic Park Built Environment Access Panel (BEAP)	Thursday 1st February

Wider South East Waste Group	Thursday 1st February
Community Event - Equality Groups (City Hall)	Monday 5th February
NLA The Big Debate - The new London Plan	Monday 5th February
London Obesity Leads Network Meeting	Tuesday 6th February
London Councils Leaders Committee (2)	Tuesday 6th February
Drain London and London Drainage Engineers Group (LoDEG)	Tuesday 6th February
London Health and Well Being Board (HWB) Chairs Network	Wednesday 7th February
Age UK Older People's Meeting	Thursday 8th February
Special meeting of the London Gypsy Traveller Forum	Tuesday 13th February
Royal Institution of Chartered Surveyors (RICS)	Thursday 15th February
ALBPO	Friday 16th February
London Stansted Cambridge Consortium (LSCC)	Monday 19th February
Centre for London. Industrial Intensification Roundtable	Tuesday 20th February
Quod Consultancy - Waste	Tuesday 20th February
Campaign to Protect Rural England (CPRE) Seminar	Wednesday 21st February
Marine Planning Workshop	Thursday 22nd February
OPDC Housing Panel	Friday 23rd February
Queer Urban Spaces & UCL Urban Laboratory (LGBT+ community)	Friday 23rd February
Greater Thames Valley Local Enterprise Partnership meeting	Wednesday 27th February
Consultation Ends	Friday 2nd March

Annex D
London Plan – Wider South East meetings

July 2017 – March 2018

10 July	Bedford Local Plan – Duty to Cooperate – Bedford
19 July	Basingstoke & Deane Horizon 2050 – Basingstoke
24 July	Medway Local Plan – Duty to Cooperate - Chatham
31 July Epping	Co-op Member Board (East Herts / West Essex Council Members) –
14 Sept	South East LEP – City Hall
20 Sept	Collaboration opportunities with Essex County – Chelmsford
21 Sept	Transport for the South East – Transport Forum - London
9 Oct	South Essex 2050 Vision – City Hall
20 Oct	Hertfordshire Development Plans Group – Welwyn Hatfield
27 Nov	Wycombe District – Economic Development – City Hall
1 Dec	South East Strategic Leaders – draft London Plan – London
7 Dec	Essex Planning Officer Association – draft London Plan – Braintree
7 Jan	Coast to Capital Partnership Board – Brighton
10 Jan	Hertfordshire authorities – draft London Plan - Hertford
11 Jan	EoE Infrastructure & Growth Group – draft London Plan - Cambridge
26 Jan	Planning Officer Society – draft London Plan - London
1 Feb	Wider South East Waste TAB Chairs - London
9 Feb	North East Surrey authorities – Duty to Cooperate – Epsom
27 Feb	Greater Thames Valley LEPs – draft London Plan – City Hall

PQ10. Have the views of Natural England been sought on the Update of the Habitats Regulations Assessment (July 2018)? If not, this should be pursued.

1. The updated report was sent to Natural England on 15 August. Natural England have indicated they will respond by 5th October.

PQ11. What further work has been or will be carried out to address the Environment Agency’s concern that there is a need to further develop the Regional Flood Risk Assessment and in particular the application of the sequential test for the designation of growth areas and to assess the impacts of climate change?

1. The Regional Flood Risk Appraisal (RFRA) was published for consultation alongside the draft London Plan and received 12 responses, some of them detailed/technical, which are being carefully considered. A revised and updated version of the RFRA will be published in September 2018. The consultation response by the Environment Agency included the following concerns:
 - a. Application of the Sequential Test
“We suggest that further clarification is needed regarding the application of the Sequential and Exceptions tests. RFRA Paragraph 18 addresses the use of the Strategic Housing Land Availability Assessment, saying that the Local Authorities were able to influence the probability percentages using their surface water mapping. We recommend that this be clarified further. For example: How many Local Authorities replied? How did Local Authority responses impact upon on overall housing numbers? How were the site capacity percentage reductions derived? ”
 - b. Climate Change
“Although some work has been done to show potential impacts of climate change, this should be stronger throughout the whole document”.
2. Following the consultation, on 3rd May, a meeting with technical Environment Agency officers took place to discuss their consultation comments. The two concerns raised are now being addressed as follows:

Application of the Sequential Test

3. At the meeting GLA officers explained the Strategic Housing Land Availability Assessment (SHLAA) methodology, and in particular the approach to environmental constraints to housing capacity, including flood risk. The SHLAA provides an aggregated understanding of housing capacity at a strategic London-wide level, and flood risk is considered as a constraint, which can impact the site assessment in terms of suitability and probability. It was agreed that additional detail about this would be included in the final RFRA.
4. To ensure understanding of the SHLAA methodology and the way flood risk has been taken into account, the final RFRA will explain the Flood Zone characterisation and the probabilities (capacity percentage reductions) assigned to the different flood risk categories. It will also explain the consultation process with the London boroughs, as they all undertook the detailed assessments based on the SHLAA methodology and had the opportunity to change the probabilities based on local information, including the impact of specific flood risk mitigation measures. Boroughs could also adapt density, land use, net residential site area and phasing assumptions for individual sites to address environmental constraints (see paragraph 2.65 of the SHLAA).

5. The SHLAA report stresses that the London boroughs still have to undertake a Sequential Test for their Local Plans (see paragraph 2.69), as the London Plan has no remit to be site-specific. Planning Practice Guidance¹ refers to its application at Local Plan level, based on a Strategic Flood Risk Assessment.

Climate change

6. The latest UK Climate Change Projections (UKCP18), including tools to interpret them, will be available from November 2018². However, the current projections (UKCP09) remain valid, and the Environment Agency did suggest that the RFRA could continue to rely on the current climate change allowances.
7. The analysis of climate change impacts in the RFRA was also considered acceptable. However, it was agreed that the final RFRA should emphasise that boroughs/developers need to do more detailed analysis of climate change impacts on individual areas/sites within Local Plans and when preparing planning applications.
8. The Environment Agency has also suggested making minor additions about addressing fluvial climate change impacts, in particular in Opportunity Areas (additions to Figure 1 of the RFRA). These will be included in the final RFRA, stressing the importance of reducing risk from climate change where opportunities arise.
9. Overall, these agreed changes to the RFRA, along with amendments in response to other consultation responses, are not expected to be substantial and the maps are expected to remain almost unchanged. Officers are involving Environment Agency officers in finalising the RFRA. These changes are not expected to have any implications for the associated Policy SI12.

¹ PPG on Flood Risk and Coastal Change – paragraph 20

² see UKCP website <http://ukclimateprojections.metoffice.gov.uk/24125>).

PQ12. What further work has been or will be carried out to address the concerns of Highways England that housing and employment development, as proposed in Opportunity Areas and housing targets for some outer Boroughs, could materially affect the safety, reliability and/or operation of the strategic road network in and around London?

1. In their representations, Highways England were concerned that outer London boroughs are permitted to adopt minimum residential parking standards in areas that are less well connected by public transport, and that this could have an adverse impact on the SRN. Policy T6.1 is clear that new residential development should not exceed the maximum parking standards set out in table 10.3 – this includes locations with lower PTALs and is applicable to all locations. T6 H allows outer London boroughs to set minimum parking standards for residential development in DPDs only in the least well-connected locations (PTALs 0-1). This would need to be evidenced and justified as part of the Local Plan process, through which Highways England would be engaged as a statutory consultee. Furthermore, Policy T6 is unequivocal that minimum standards are not appropriate for non-residential land uses in any part of London. It is important to note that this is an improvement on the 2016 London Plan, and that combined with other measures, as mentioned below, it will help to mitigate the impact of new development on the SRN in such locations.
2. The draft London Plan is consistent with the 2012 NPPF in encouraging sustainable transport and requiring developments that have impacts on the transport network, including the SRN, to provide Transport Assessments to ensure that impacts are fully assessed. Policy T4 requires, where appropriate, measures to mitigate adverse transport impacts to be implemented in turn. The 2012 NPPF requires that developments that generate significant movement are located where the need to travel will be minimised and use of sustainable transport maximised. Good Growth is at the heart of the Plan, and a key part of this is the approach to promoting development in well-connected locations, reducing car use, promoting Healthy Streets and encouraging active and sustainable travel. A shift from car use is the only long term solution to road congestion and the Plan seeks to achieve this – thereby avoiding further negative impacts on the SRN that would otherwise be associated with the level of planned growth.
3. The planning of opportunity areas specifically includes the development of Opportunity Area Planning Frameworks and other formal planning documents. The draft London Plan requires new and improved walking, cycling and public transport networks to be planned at an early stage in Opportunity Areas and encourages the co-ordination of transport investment and development proposals to support car-free and car-lite lifestyles. This is reflected in the lower maximum residential parking standards for Opportunity Areas. Strategic transport studies are carried out to understand and mitigate any negative transport impacts of developments in Opportunity Areas, which can allow the maximum parking provision to be capped to prevent unacceptable impacts. These studies will show how Opportunity Areas can contribute to the achievement of the target in the Mayor's Transport Strategy (MTS) for 80 per cent of trips in London to be made on foot, by cycle or using public transport by 2041, which will support the mitigation of any potential impacts on the strategic road network. The GLA will involve Highways England in the development of OAPFs and supporting evidence.
4. [Strategic transport modelling](#) was carried out by TfL as part of the transport evidence base for the draft London Plan and for the development of the MTS. The key conclusion of that assessment is that if the policies and proposals laid out in the MTS are delivered, then the

population and employment growth envisaged in the Plan can be achieved with sustainable transport outcomes i.e. 80 per cent of trips in London being made on foot, by cycle or using public transport. Overall the strategic modelling shows that housing and employment development across London can be achieved with 10 to 15 per cent less vehicle traffic across London in 2041 than in 2015. Traffic would also be lower in outer London, alleviating the impacts of proposed growth on the SRN.

5. This policy approach and evidence demonstrate how the Spatial Development Strategy will achieve growth without materially affecting the safety, reliability and operation of the SRN in London.
6. Highways England note in their response the previous constructive engagement that has taken place between TfL/the GLA and Highways England on Economic Growth Plans and that they would welcome the opportunity to continue to build on previous dialogue on the draft London Plan to better understand the impacts on the SRN, including in relation to the Strategic Transport Model. The GLA and TfL would welcome continued constructive engagement, including in relation to in transport modelling.

PQ13. What changes would need to be made to policy T8D and other parts of the Plan to ensure consistency with national policy relating to Heathrow airport as set out in the Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (June 2018).

1. No changes are considered to be required to T8D or other parts of the draft Plan with regard to the Airports National Policy Statement (ANPS).
2. The Airports National Policy Statement (ANPS) states (at paragraph 3.54) that:
'The Heathrow Northwest Runway scheme will be accompanied by a package of measures to mitigate the impact of airport expansion on the environment and affected communities'.
3. However, the Mayor, recognising that the ANPS does not contain many 'specifics' in terms of what this mitigation needs to consist of, and in light of his statutory duties with regards to London, considers that the wording of policy T8D is helpful to provide a level of guidance in terms of what the mitigation needs to achieve. This is particularly with a view to section 104 of the Planning Act 2008. This provides that 'important and relevant' matters (which will include the London Plan by virtue of it being part of the development plan) will need to be taken into account in the decision-making process undertaken by the Secretary of State on any application for a Development Consent Order to authorise airport expansion. As such, it is important that the Mayor's position on impacts (and, by implication, required mitigation) is set out in the draft London Plan so they can be taken into account fully by the Secretary of State. The Mayor's position, as set out in policy T8D, is that expansion at Heathrow must achieve no additional noise or air quality harm. It is considered that this is not inconsistent with the ANPS, but instead provides a level of clarity that is absent from it.
4. The ANPS and supporting Appraisal of Sustainability identify potential significant impacts without detailing any mitigation measures. Paragraph 5.35 of the ANPS states that, in respect of air quality:
'The Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage'.
5. Paragraph 5.68 of the ANPS states that, in respect of noise, development consent should not be granted unless the Secretary of State is satisfied the proposals meet certain aims for the effective management and control of noise. Policy T8D adopts a similar approach to ensure sufficient mitigation measures would be in place should expansion occur.
6. Paragraphs 5.37 and 5.57 of the ANPS identify that the precise package of mitigations in respect of air quality and noise should be subject to consultation with local stakeholders and communities to ensure the most effective measures are taken forward and that an extensive range of measures is likely to be required. Given that there is still a process to be undertaken whereby the mitigation measures are to be identified and evaluated, it is considered to be entirely appropriate for these to be considered in any future planning decision. As stated above, policy T8D provides a framework for that consultation.
7. The second part of T8D deals with how the benefits of regulatory and technological improvements would be fairly shared with affected communities. This is also consistent with the ANPS which identifies, *inter alia*, how technologies can impact on aircraft noise, with paragraph 5.60 emphasising the need for future improvements to be shared with local communities, thereby balancing growth potential with noise reduction benefits.

8. Other policies in the draft Plan are consistent with the ANPS. For example, the indicative list of transport schemes in table 10.1 (linked to T1) identifies improvements to public transport at Heathrow. This will help to promote surface access links identified in chapter 3 of the ANPS, and which are also a requirement of T8F, and will also be important in helping to mitigate potential impacts associated with an intensification of use at Heathrow.

PQ14. Having regard to the findings of the Inspector in 2014 regarding the Further Alterations to the London Plan¹, how has the issue identified in relation to constructive engagement with the adjoining waste planning authorities been addressed in the preparation of the London Plan?

1. There has been constructive, detailed and ongoing engagement with London Boroughs and the wider south east since 2015. This has involved meeting with a range of stakeholder groups and forums, as outlined below.

Wider South East Collaboration

2. [Wider South East \(WSE\)](#) collaboration arrangements were put in place in 2015 to coordinate strategic policy and infrastructure investment more effectively across the 156 authorities of London, the East and the South East of England, and to facilitate constructive engagement across a range of strategic issues, including waste management. This is reflected in policy SD2 (part E) of the draft London Plan, which emphasises a collaborative approach to working with WSE across a range of issues, including waste.
3. Waste has been discussed at three WSE summits as summarised below:
 - [2 October 2015 Officer Working Group](#), minerals and waste were discussed as an agenda item, with presentations from representatives from the East of England Waste Technical Board, South East Waste Planning Board and London Waste Planning Forum (the WSE Technical Advisory Bodies (TABs) on waste) and subsequent discussion. It was highlighted that a common methodology had been agreed between the WSE partners and the Environment Agency on waste exports from London.
 - [19 June 2017 Officer Working Group](#), presentation on waste management across the Wider South East by the London Waste Planning Forum, with meeting also attended by South East Waste Planning Advisory Group. The collaboration of the TABs was welcomed, with the WSE complementing the specific technical work of the TABs. It was noted that the South East and East of England were to undertake research on landfill sites to inform the London Plan.
 - 25 June 2018 Wider South East Officer Working Group, following the draft London Plan consultation: the meeting featured an item on strategic waste management, which included the presentation of a joint paper by the TABs. Concerns were raised about excavation waste, which were taken into account in the [Minor Suggested Changes](#). A potential new Statement of Common Ground was discussed to facilitate commitment for the delivery of waste management sites, engagement is ongoing through the Officer Working Group and the TABs.
4. In addition to the above, several other meetings have been attended with waste Technical Advisory Bodies in the Wider South East:
 - East of England RTAB 16 May 2017: GLA officers presented the context for waste policy in London and the London Plan. Feedback from attendees was that the WSE was not paying enough attention to waste issues. In response, waste was put on the agenda for the WSE meeting of June 2017, where a presentation on waste policy issues was given by GLA officers.

¹ Paragraph 11

- South East RTAB 13 July 2017: GLA officer presented the context for waste policy in London and the London Plan, including draft policies in relation to waste (SI4, SI5, & SI6). The Chair of the RTAB provided comments via email (20/07/2017) - general support for the policies was expressed, with some commentary on wording and the approach to assessing proposals for new/expanded waste facilities. These comments were considered during the drafting of policy SI7 and SI8.

Policy Development

City for All Londoners

5. As part of the wider consultation on a City for all Londoners², there was an Environment Workshop on 17th November 2016 which included a [session](#) on waste and recycling in London, and how the Mayor can improve recycling rates and moving to a circular economy ([Waste – recycling and the circular economy session](#)). This was attended by local boroughs and community organisations.³

Evidence Base

6. As part of the development of the Apportionment study, a workshop was held on 22 March 2017 with boroughs and stakeholders from the wider south east, with respondents including the East of England Waste and Technical Advisory body. [SLR Task 4 Report – Appendix 2](#) summarises the results of the consultation.

London Plan consultation

7. Meetings were held with a number of regional/sub-regional waste organisations as part of the consultation of the draft London Plan. As set out below:
 - Western Riverside Waste Authority Liaison Meeting 8 Dec 2017
 - East London Waste Authority (ELWA) 19 Dec 2017
 - South East Waste Planning Advisory Group (SEWPAG) 16 Jan 2018
 - LWARB/GLA Waste Industry Event 19 Jan 2018
 - East of England Waste Technical Advisory Board (EoE WTAB) 23 Jan 2018
 - London Waste Planning Forum (LWPF) 24 Jan 2018
 - Wider South East Waste Group 1 Feb 2018
8. A number of meetings also took place with the London Waste Planning Forum, which also includes some membership from the wider South East:
 - LWPF Meeting 26 January 2016: a GLA officer discussed the Mayor’s early thinking on waste policy. The officer also sought the group’s feedback on apportionment. The group agreed that the apportionment model is helpful, but that the model should be updated. In 2017 the GLA commissioned external consultants (SLR & LUC) to update and verify the GLA’s waste arising forecast, as well as review and revise the apportionment methodology. The findings of [the report](#) inform the draft London Plan.

² <https://www.london.gov.uk/get-involved/all-consultations/city-all-londoners>

³ Royal Borough of Kensington and Chelsea, London Borough of Islington, Institute for Civil Engineers, CPE London, North London Waste Plan, London Waste Planning Forum, London Borough of Brent, City of London and Royal Borough of Greenwich, Brent Terrace Residents’ Association, Edenborough Agency, Royal Borough of Kingston upon Thames, London Waste and Recycling Board, Bank of England, London Councils, London Borough of Enfield, London Borough of Sutton.

- LWPF Meeting 19 July 2016: a GLA officer presented a paper on construction, demolition and excavation waste. The group provided comments on the paper in the meeting and invited further comments.
- LWPF Meeting 25 January 2017: a GLA officer provided an update on the London Plan process.
- LWPF Meeting 26 April 2017: a GLA officer presented on proposed changes to waste policies in the draft London Plan and invited comments from the group. Net self-sufficiency, safeguarding sites and apportionment were discussed.
- LWPF Meeting 18 July 2017: a GLA officer updated the group on waste policy in the draft London Plan, invited discussion and comments.
- LWPF Meeting 19 October 2017: a GLA officer presented on the draft London Environment Strategy and links with the London Plan.
- LWPF Meeting 24 January 2018: a GLA officer presented on the draft London Plan and invited comments on specific questions around apportionment, safeguarding and zero waste.

Submissions on the London Plan

9. Wider constructive engagement is evidenced in the range of responses to the draft London Plan from authorities and groups of authorities in proximity to London, including:
 - Berkshire Strategic Planning Group
 - Bracknell Forrest
 - Essex County Council
 - Broxbourne Borough Council
 - Buckinghamshire County Council
 - Cambridgeshire
 - Central Cambridgeshire
 - Chelmsford
 - East of England LGA
 - Essex County Council
 - Hertfordshire County Council
 - Luton Borough Council
 - Norfolk County Council
 - West Sussex County Council
 - Wokingham Borough Council
10. Representations were also received from Strategic Waste advisory groups, which emphasise the constructive approach that has been developed over the last few years:
 - East of England Waste Tech Advisory Group: *'keen to maintain the constructive working relationship with the GLA and very much welcome the opportunities to shape the plan'*
 - South East Waste Planning Advisory Group: *'In helping SEWPAG understand the content of the Draft London Plan, and the Waste Chapter in particular, it has received support from a GLA officer and would like to take this opportunity to record its gratitude. It will be important that such support and cooperation between the GLA and SEWPAG continues to ensure that the Draft London Plan is fit for purpose and is implemented effectively. On behalf of its member Waste Planning Authorities, SEWPAG would also like to record its thanks for any support received from the GLA associated with preparation of their Waste Local Plans and would urge the GLA to continue to provide such support in future.'*

- London Waste Planning Forum: *'We would like to thank GLA officers for continuing involvement in our meetings. In particular GLA officers contributed to discussions on the waste element of the London Plan review in advance of the consultation and we are grateful for that opportunity to contribute to the review of the Plan. We helped GLA officers organise a special LWPF meeting to discuss the changes to the apportionment methodology of the London Plan and we are grateful for the open manner in which that consultation was carried out.'*
- London Waste and Recycling Board: *'LWARB has provided technical advice to the GLA during the drafting of the new London Plan. We are pleased to observe several of our recommendations have been included within the draft.'*

11. For further discussion of collaboration and engagement, please see answers to PQ8 and PQ9.