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| **Foreword** | | | | |
| MSC.F.1 | Foreword  third paragraph | Throughout this evolution, London has seen waves of growth and our surroundings reflect these past chapters of rapid development and change. We now face another wave of growth, the likes of which we’ve not seen for a century. Our population is projected to increase by 70,000 every year, reaching 10.~~5~~**8** million in 2041. |  | Factual correction and consistency within the Plan |
| MSC.F.2 | Foreword  seventh paragraph | Some of the very richest and very poorest people in the country live in London, with **healthy** life expectancy differing by up to 19 years between boroughs… |  | Factual correction and consistency within the Plan |
| **Introducing the Plan** | | | | |
| MSC.0.1 | Introduction  Paragraph 0.0.3 | 0.0.3 The general objectives for the London Plan, and the process for drawing it up, altering it and replacing it, are set out in the Greater London Authority Act 1999 (as amended) and **the Town and Country Planning (London Spatial Development Strategy) Regulations 2000**. ~~supporting detailed regulations.~~ The **London** Plan has been developed in line with these requirements. |  | Factual Update |
| MSC.0.2 | Introduction  Paragraph 0.0.5 | 0.0.5 In developing th**e**~~is~~ **SDS** ~~strategy~~, in accordance with the legislation3 and associated regulations, the Mayor has had regard to: |  | Clarification |
| MSC.0.3 | Introduction  Paragraph 0.0.6 | 0.0.6 In drawing up the new London Plan, the Mayor has also had regard to:  • All relevant European Union **obligations of the UK** ~~legislation and policy instruments like the European Spatial Development Perspective~~ like the European Spatial Development Perspective  **•** The need to ensure consistency with national policies and international treaty obligations notified to the Mayor by Government, without seeking to repeat national policy  **•** The Mayor’s other statutory obligations including the duty for the GLA to do all it reasonably can to prevent crime and disorder under the Crime and Disorder Act 1998, and the public-sector equality duty, as set out in Section 149 of the Equality Act 2010, covering race, disability, gender, age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment**.**   * the specific requirements of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000. |  | Clarification |
| MSC.0.4 | Introduction  Paragraphs 0.0.7 and 0.0.8 | 0.0.7 The document brings together the geographical and locational aspects of the Mayor’s other strategies, **to ensure consistency with those strategies,** including those dealing with:  **•** Transport  **•** Environment  **•** Economic Development  **•** Housing  **•** Culture  **•** Health and Health Inequalities.  ~~0.0.8 The draft Plan has been developed alongside the Mayor’s other statutory strategies to ensure consistency with those strategies~~. |  | Clarification |
| MSC.0.5 | Introduction  Paragraph 0.0.9 | 0.0.9 The London Plan is legally part of each of London’s Local Planning Authorities’ Development Plan and must be taken into account when planning decisions are taken in any part of **Greater** London. Planning applications should be determined in accordance with it, unless there are sound planning reasons (other material considerations) which indicate otherwise. ~~The Plan provides the strategic, London-wide policy context for borough local development plan documents;~~ **All** ~~all local~~ **D**~~d~~evelopment **P**~~p~~lan **D**~~d~~ocuments and Neighbourhood Plans have to be ‘in general conformity’ with the London Plan. |  | Clarification |
| MSC.0.6 | Introduction  Paragraph 0.0.10 | 0.0.10 Planning in London is the joint responsibility of the Mayor of London and the 32 London boroughs, the City of London Corporation and the Mayoral Development Corporations (MDCs)~~,~~ **(**of which there are currently two: the London Legacy Development Corporation and the Old Oak Park Royal Development Corporation**) along with neighbourhood forums designated by London’s local planning authorities.** When the **London** Plan refers to ‘boroughs’ it is referring to the 32 London boroughs, the City of London and the MDCs. This approach has been taken to make the document more readable. | Community Groups (Just Space, Fortune Green & West Hampstead NDF, Redington Frognal Neighbourhood Forum, Mill Hill Neighbourhood Forum, Highgate Society, Neighbourhood Planners, Old Bermondsey Village Neighbourhood Forum), Oneill Homer, individuals | Clarification |
| MSC.0.7 | Introduction  Paragraph 0.0.11 | 0.0.11 ~~This~~ **The London** Plan must be read as a whole. The placement of the topic chapters and the policies within the chapters is no reflection on their importance or weight – it does not represent a hierarchy. |  | Readability |
| MSC.0.8 | Introduction  Paragraph 0.0.12 | 0.0.12 The **London** Plan sets out policies and supporting text (also known as reasoned justification). These take account of:  **•** the legal requirements related to the development of the **London** Plan (including those discussed above) and the various issues that European and national legislation requires to be considered  **•** other requirements of ~~planning law and~~ Government planning policy and guidance (without seeking to repeat these) |  | Clarification and readability |
| MSC.0.9 | Introduction  Paragraph 0.0.13 | 0.0.13 The **published London** ~~final~~ Plan will also take account of the comments received during the consultation process and the recommendations of the panel that conduct the Examination in Public (see Next Steps). |  | Readability |
| MSC.0.10 | Introduction  Paragraphs 0.0.14 and 0.0.14A  Footnote 4 | 0.014 This London Plan runs from 2019 to 2041. This date has been chosen to provide a longer-term view of London’s development to inform decision making. However, some of the more detailed elements of the Plan, such as the **annual** housing targets are set ~~only~~ for **only** the first ten years of the Plan. This reflects ~~the dynamic nature of London’s land market and means that there will need to be a review of the housing targets before 2029.~~ **the capacity of land suitable for residential development and intensification identified in the 2017 Strategic Housing Land Availability Assessment (SHLAA), which due to the dynamic nature of London’s land market does not attempt to robustly identify capacity beyond 2029.** ~~Other elements of the Plan will need to be updated over time through Supplementary Planning Guidance as part of the ‘plan, monitor, manage’ approach~~  **0.0.14A The Government recently published a new methodology for calculating housing need. This new methodology was published too late to be incorporated into the evidence-base for the new London Plan, which instead relies on the 2017 Strategic Housing Market Assessment (SHMA) for its evidence of housing needs. The 2017 SHMA uses an established methodology, that takes full account of the diversity of London’s housing needs and has been found sound at previous Examinations.**  ~~Footnote 4 The draft Plan is underpinned by housing and economic projections. These projections are based on past trends. Monitoring this sort of information and the implementation of the Plan identifies when policies may need to be reviewed and changed~~ | MDCLG | Clarification and factual update |
| MSC.0.11 | Introduction  Paragraph 0.0.15 | 0.0.15 To help the reader navigate through the **London** Plan, paragraphs include key words in bold. |  | Readability |
| MSC.0.12 | Introduction  Paragraph 0.0.17 | 0.0.17 This is a new **London** Plan (also known as a Replacement Plan). This means it is not an alteration or update to previous **London** Plans. This **new London** Plan, **once published** will be the third London Plan, the previous ones being the 2004 **London** Plan produced by former Mayor of London Ken Livingstone and the 2011 **London** Plan produced by former Mayor of London Boris Johnson. All of the other iterations of the London Plan from 2004-2016 have been alterations. Once **published** ~~adopted~~ this **London** Plan will replace all previous versions. |  | Readability |
| MSC.0.13 | Introduction  Paragraph 0.0.18 | 0.0.18 This **London** Plan is different to those that have gone before it. It is more ambitious and focused than any previous **London** Plans. The concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable – underpins the **London** Plan and ensures that it is focused on sustainable development. |  | Readability |
| MSC.0.14 | Introduction  Paragraph 0.0.19 | 0.0.19 As well as taking account of the relevant legislation, ~~regulations~~ and Government policy, this **London** Plan also seeks to deliver the Mayor’s manifesto commitments and - alongside the Mayor’s other strategies – set the framework for how these commitments can be achieved in spatial development terms. |  | Clarification and Readability |
| MSC.0.15 | Introduction  Paragraph 0.0.20 | 0.0.20 The polic**i**es in the **new London** Plan have been developed over a number of months and are supported by a proportionate evidence base5. ~~In their development, the Mayor has had regard to the need to ensure consistency with national policies, but does not seek to repeat them. Instead~~ ~~t~~**T**he **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** ~~the capital~~ ~~On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment reflects the particular circumstances of London. The scale of the Mayor’s election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments.~~ | GLA Conservative Group, Alliance, Affinity, MDCLG, London Boroughs, London First, Silvertown Homes, Chessington World of Adventures Resort, Aitch Group, Mill Hill Neighbourhood Forum, Camden Conservatives, Chessington World of Adventures Resort, Roxhill Developments Ltd, Church Row and Perkins Walk Neighbourhood Forum | Clarification |
| MSC.0.16 | Introduction  Paragraph 0.0.21 | 0.0.21 **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.** ~~The drafting of the Plan aims to ensure that London is ready to implement this ambitious Plan as soon as possible and that the policies do not take years to implement due to the time it can take to update local development plan documents. As the London Plan is part of every borough’s development plan, there is no requirement for the policies to be repeated at the local level before they can be implemented. However, in some instances a local approach is required within the context of the overall policy. The Plan clearly sets out where this is the case.~~ | HBF, Fairview Homes, LB Camden | Clarification |
| MSC.0.17 | Introduction  Paragraphs 0.0.22 and 0.0.23 | 0.0.22 This **new London** Plan provides the framework to address the key planning issues facing London**;** ~~This~~ allow**ing**~~s~~ boroughs to spend time and resources on those issues that have a distinctly local dimension and on measures that will help deliver the growth London needs. This includes area-based frameworks, action plans and Supplementary Planning Documents, site allocations, brownfield registers and design codes**, as well as supporting neighbourhood planning**.  0.0.23 It is crucial that all those involved in planning and development in London understand how London’s ~~two~~**three**-tier planning system **works (including regional, local and neighbourhood planning)** and do not seek to duplicate policy or evidence unnecessarily. | Individuals  Just Space | Clarification |
| MSC.0.18 | Introduction  Paragraphs 0.0.27 | 0.0.27……The IIA approach addresses the Mayor’s legal duties to carry out a comprehensive assessment of the Plan and its proposed polic**i**es with one integrated process. |  | Readability |
| MSC.0.19 | Introduction  Paragraphs 0.0.33 | 0.0.33 The EiP is a hearing based around a detailed discussion of selected subjects covered by the **proposed** new ~~draft~~ London Plan. It is likely to be held in the autumn of 2018. After it is completed, the Panel will produce a report recommending changes to the **London** Plan for the Mayor’s consideration, which the Mayor can decide to accept or reject. |  | Readability |
| **Chapter 1 Planning London’s Future (Good Growth Policies)** | | | | |
| MSC.1.1 | Paragraph 1.0.1 | * + 1. London’s growth and development is shaped by the decisions that are made every day by planners, planning applicants, ~~and~~ decision-makers **and Londoners** across the city. | Just Space | Clarification |
| MSC.1.2 | Paragraph 1.0.3A | *Insert new paragraph 1.0.3A*  **1.0.3A** By setting a new level of ambition for the people who make all of London’s planning decisions, this London Plan will **help realise the Mayor’s vision of creating** ~~create~~a ~~better~~ city for all Londoners, **where no one is left behind** | Individuals | Clarification |
| MSC.1.3 | GG1 Paragraph 1.1.1 | 1.1.1 London is made up of diverse communities. Its neighbourhoods, schools, workplaces, parks, community centres and all the other times and places Londoners come together give the city its cultural character and create its future. Planning for Good Growth means planning ~~for~~ **with** these communities – both existing and new - ~~helping them to flourish and~~ making new connections ~~between them~~**, and eroding inequalities**. |  | Readability and consistency with other GLA strategies |
| MSC.1.4 | GG1 Paragraph 1.1.2 | 1.1.2 40 per cent of Londoners are from Black, Asian and Minority Ethnic (BAME) backgrounds, and the city is home to a million EU citizens**,** ~~and~~ 1.2 million disabled people, **and up to 900,000 people who identify as LGBT+. Over a fifth of London’s population is under 16, but over the coming decades the number of Londoners aged 65 or over is project to increase by 90 per cent.** ~~The success of London’s communities relies upon t~~ **T**his diversity **is essential to the success of London’s communities.** ~~To keep them strong,~~ **To maintain this** London mustremain open**,** ~~and~~ inclusive~~,~~ **and** allow~~ing~~ everyone to share in and contribute towards the city’s success. | Age UK London and UCL urban laboratory | Factual update and clarification |
| MSC.1.5 | GG1  Paragraph 1.1.3 | 1.1.3 ~~This will not be easy.~~ London is one of the richest cities in the world, but it is also home to some of the poorest communities in the country, |  | Readability |
| MSC.1.6 | GG1 Paragraph 1.1.4 | 1.1.4 Delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspace in accessible locations, **built forms that work with local heritage and identity,** and social, physical and environmental infrastructure that meets London’s diverse needs is essential if London is to maintain and develop strong and inclusive communities. | Historic England | Clarification |
| MSC.1.7 | GG1 Paragraph 1.1.5 | 1.1.5 Early engagement with local people leads to better planning proposals, with Neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their areas. Taking advantage of the knowledge and experience of local people will help to shape London’s growth, creating a thriving city that works better for ~~the full diversity of its inhabitants.~~**all Londoners.** |  | Readability and clarification |
| MSC.1.8 | GG1 | **Good growth is inclusive growth.** To build on the city’s tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: | Individual and Atkins | Clarification |
| MSC.1.9 | GG1 AA | *Insert new clause AA*  **AA seek to ensure changes to the physical environment achieve an overall positive contribution to London.** | InLInkUK | Clarification |
| MSC.1.10 | GG1 B | B provide access to good quality **community spaces,** services and amenities **and infrastructure** that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation. | Selby Trust and community groups | Clarification |
| MSC.1.11 | GG1 BA | *Previous clause A is now BA*  ~~A~~ **BA** seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer**, more inclusive** and more equal city. | Access Association | Clarification |
| MSC.1.12 | GG1 C | C ensure that streets and public spaces are **consistently** planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging**, which encourage** ~~and~~ community **buy-in** ~~ownership~~, and where communities can develop and ~~flourish~~ **thrive**. | Access Association and Crest Nicholson | Clarification and readability |
| MSC.1.13 | GG1 D | D promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for ~~face-to-face contact and social interaction~~ **building relationships** during the daytime, evening and night time. |  | Clarification |
| MSC.1.14 | GG1 E | E ensure that new buildings and the spaces they create are designed to reinforce or enhance the **identity,** legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements. | Historic England | Clarification |
| MSC.1.15 | GG1 F | F support **and promote** the creation of a London where all Londoners, including **children and young people,** older people, disabled people**,** and people with young children**,** **as well as people with other protected characteristics,** can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation. | Individual and UCL urban laboratories individuals | Clarification |
| MSC.1.16 | GG1 FA | *Insert new clause FA*  **FA support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers and challenges and inequalities.** |  | Consistency with other GLA strategies |
| MSC.1.17 | GG2  Paragraph 1.2.3 | 1.2.3 The benefits of this approach are wide-ranging, going well beyond the simple ability to provide more homes and jobs. High-density, mixed-use places support the clustering effect of businesses known as ‘agglomeration’, maximising job opportunities. They provide a critical mass of people to support the investment required to build the schools, health services**,** ~~and~~ public transport **and other** infrastructure that neighbourhoods need to work. They are places where local amenities are within walking and cycling distance, and public transport options are available for longer trips, supporting good health, allowing strong communities to develop, and boosting the success of local businesses. | London Forum of Amenity and Civic Societies | Clarification |
| MSC.1.18 | GG2  Paragraph 1.2.6 | 1.2.6 As London develops, the Mayor’s Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering **more than** 50 per cent green cover across London, will be important to help London become a National Park City. |  | Clarification |
| MSC.1.19 | GG2  Paragraph 1.2.7 | 1.2.7 London’s distinctive character and heritage is why many people want to come to the city. **London’s heritage holds local and strategic significance for the city and for Londoners, and will be conserved and enhanced.** As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, ~~can~~ **should** be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places. | Historic England and London Forum of Amenity and Civic Societies | Clarification |
| MSC.1.20 | GG2 | To create **successful** ~~high-density~~**~~,~~** mixed-use places that make the best use of land, those involved in planning and development must: | LB Islington, LB Harrow  LB Hillingdon and London Forum of Amenity & Civic Societies | Clarification |
| MSC.1.21 | GG2 A | A **enable** ~~prioritise~~ the development of **brownfield land, prioritising** Opportunity Areas, ~~brownfield land,~~ surplus public sector land, ~~and~~ sites which are well-connected by existing or planned Tube and rail stations, **and** sites within and on the edge of town centres, ~~and~~ **as well as utilising** small sites. | LB Brent | Clarification |
| MSC.1.22 | GG2 B | B proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling to **other infrastructure and services**, applying a design–led approach. | LB Lewisham and London NHS CCG | Clarification |
| MSC.1.23 | GG2 C | C understand what is valued about existing places and use this as a catalyst for growth**, renewal**, and place-making, strengthening London’s distinct and varied character. | Friends of the Earth | Consistency within the Plan |
| MSC.1.24 | GG2 D | D protect **and enhance** London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, **including aiming to secure net biodiversity gains where possible.** | LB Hillingdon and Royal Society for the Protection of Birds | Clarification and consistency within the Plan |
| MSC.1.25 | GG3 Paragraph 1.3.1 | 1.3.1The **mental and physical** health of Londoners is, to a large extent, determined by the environment in which they live. | LB Southwark, London Healthier Places Network | Clarification |
| MSC.1.26 | GG3 Paragraph 1.3.2 | 1.3.2 **As set out in the Mayor’s draft Health Inequalities Strategy,** ~~T~~**t**he scale of London’s health inequalities is great, and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London’s ongoing growth provides an opportunity to reduce these inequalities**.**~~, and d~~**D**elivering Good Growth will involve prioritising health in all London’s planning decisions**, including through design that supports health outcomes, and the assessment and mitigation of any potential adverse impacts of development proposals on health and health inequality**. | LB Camden | Consistency with other GLA strategies |
| MSC.1.27 | GG3 Paragraph 1.3.3 | 1.3.3 .…Access to green and open spaces, including waterways, can improve health, but access **and quality** varies widely across the city… | London Wildlife Trust | Clarification |
| MSC.1.28 | GG3 B | B promote more active and healthy **lives** ~~lifestyles~~ for all Londoners and enable them to make healthy choices. | My Fair London | Clarification |
| MSC.1.29 | GG3 D | D assess the potential impacts of development proposals **and development plans** on the **mental and physical** health and wellbeing of communities, in order to mitigate any potential negative impacts**, maximise potential positive impacts,** and help reduce health inequalities, for example through the use of Health Impact Assessments. | Public Health England  London NHS CCG  London Assembly | Clarification |
| MSC.1.30 | GG3 DA | *Insert new clause DA*  **DA plan for appropriate health and care infrastructure to address the needs of London’s changing and growing population.** | Office of London CCGs, LB Lewisham | Clarification |
| MSC.1.31 | GG3 DB | *Insert new clause DB*  **DB seek to improve London’s air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution.** | Friends of the Earth | Clarification |
| MSC.1.32 | GG3 E | E plan for improved access to green spaces**, improvement to their quality,** ~~and~~ the provision of new green infrastructure, **and spaces for play, recreation and sports.** | London Volleyball, Sports England, LB Harrow, LB Richmond, LB Wandsworth | Clarification |
| MSC.1.33 | GG4  Paragraph 1.4.2 | 1.4.2 The state of London’s housing market has implications for the makeup and diversity of the city. Affordable housing is central to allowing Londoners of all means and backgrounds to play their part in community life. Providing a range of high quality, well-designed, accessible homes is important to delivering Good Growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live. **The failure to provide sufficient numbers of new homes to meet London’s need for affordable, market and specialist housing has given rise to a range of negative social, economic and environmental consequences, including: worsening housing affordability issues, overcrowding, reduced labour market mobility, staff retention issues and longer commuting patterns.** | Barton Wilmore  London Chamber of Commerce | Clarification |
| MSC.1.34 | GG4  Paragraph 1.4.3 | 1.4.3 The lack of supply of the homes that Londoners need has played a significant role in London’s housing crisis. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing, and for affordable housing in particular. London needs 66,000 new homes each year, for at least twenty years and evidence suggests that 43,000 of them should be genuinely affordable if the needs of Londoners are to be met. This supports the Mayor’s strategic target of 50 per cent of all new homes being genuinely affordable, **which is based on viability evidence**. 270,000 homes are in the planning pipeline, but delivery is not keeping pace. | Numerous community/ campaign groups. | Clarification |
| MSC.1.35 | GG4  Paragraph 1.4.5 | 1.4.5 To meet the growing need, London must seek to deliver new homes through **a wide range of development options** ~~every available means~~. Reusing large brownfield sites will remain crucial, although vacant plots are now scarce, and the scale and complexity of large former industrial sites makes delivery slow. Small sites in a range of locations can be developed more quickly, and enable smaller builders to enter the market. Building more housing as part of the development of town centres will also be important, providing homes in well-connected places that will help to sustain local communities. | Chiswick Protection Group | Clarification |
| MSC.1.36 | GG4  Paragraph 1.4.5A | *Insert new* *paragraph* *1.5.A*  **1.4.5A The homebuilding industry itself also needs greater diversity to reduce our reliance on a small number of large private developers. New and innovative approaches to development, including Build to Rent, community-led housing, and self- and custom-build, will all need to play a role, and more of our new homes will need to be built using precision-manufacturing. Alongside this, there will need to be a greater emphasis on the role councils and housing associations play in building genuinely affordable homes.** | London Boroughs | Clarification |
| MSC.1.37 | GG4  Paragraph 1.4.6 | 1.4.6 There are a range of other measures that **have an** impact on the availability of homes. **For example,** **~~E~~e**xisting homes must not be left empty, and have the potential to be brought back into use as affordable housing~~The Build to Rent model can deliver homes for rent quickly~~, **and** ~~B~~**b**oroughs should use all the tools at their disposal to ensure that homes are actually built after planning permissions are granted. | London Boroughs | Readability |
| MSC.1.38 | GG4  Paragraph 1.4.7 | 1.4.7 … ~~Together~~ **Along** with the London Housing Strategy, this London Plan establishes the framework… |  | Readability |
| MSC.1.39 | GG4 D | D identify and allocate a range of sites~~, including small sites,~~ to deliver housing locally, supporting skilled precision-manufacturing… | LB Greenwich | Clarification |
| MSC.1.40 | GG4  Paragraph 1.4.9 | 1.4.9 ...The people who these businesses employ need strong communities, **good public transport connections**, pleasant environments that promote good health, **access to shops and local services**, and good quality, affordable homes in places they want to live… | London Forum of Amenity and Civic Societies | Clarification |
| MSC.1.41 | GG4  Paragraph 1.4.10 | 1.4.10 …growth in town centres across London will be equally important, **alongside** supporting local regeneration**, investment in Opportunity Areas and enabling access to a wide range of jobs**. Reasonably-priced, good quality employment space will be needed across London to make this happen. | LB Kingston  The Putney Society  Centre for Accessible Environments | Clarification |
| MSC.1.42 | GG5 G | G ~~maximise~~**make the fullest use of** London’s existing and future public transport, walking and cycling network… | LB Newham | Clarification |
| MSC.1.43 | GG5  Paragraph 1.5.3 | 1.5.3 …developments must plan for a more integrated approach to water management, while ~~protecting against~~ **minimising** flood risk. | Environment Agency  London Wildlife Trust | Clarification |
| MSC.1.44 | GG6 B | B …making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, **while mitigating against** and avoiding contributing to the urban heat island effect. | Trees and Design Action Group | Clarification |
| MSC.1.45 | GG6 D | D take an integrated **and smart** approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together. | Levitt Bernstein LLP | Clarification |
| **Chapter 2 Spatial Development Patterns** | | | | |
| MSC.2.1 | Figure 2.1 | *Map to be amended*  Figure 2.1 – The Key Diagram |  | Factual |
| MSC.2.2 | SD1 A 1 d | To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:  1)…..  d) are prepared in **an open and** timely manner | BSRIA | Consistency |
| MSC.2.3 | SD 1 B 3 | Boroughs, through their Development Plans and decisions should:  3) plan for and provide the necessary social and other infrastructure to sustain growth **and create mixed and inclusive communities**, working with **community and** infrastructure providers where necessary. |  | Consistency |
| MSC.2.4 | SD1 B 3A | B Boroughs, through Development Plans and decisions, should:  3A) recognise the role of heritage in place-making | Historic England | Clarification |
| MSC.2.5 | SD1 B 4 | B Boroughs, through Development Plans and decisions, should:  4) recognise that larger areas can define their own character and densityestablish the capacity for growth in the Opportunity Areas in accordance with Policy D2 Delivering good design and Policy D6 Optimising density | Historic England | Clarification |
| MSC.2.6 | SD1  Paragraph 2.1.1 | 2.1.1 Opportunity Areas are identified as the capital’s most significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two. | LB Haringey | Clarification |
| MSC.2.7 | SD1  Paragraph 2.1.3 | 2.1.3 The Mayor will provide the support and leadership to ensure Opportunity Areas deliver their growth potential for Londoners. He will promote and champion the areas as key locations for investment, and will intervene where required so that an ambitious, imaginative and inclusive approach is taken to accelerate and realise their growth and development………This approach should include understanding the existing character and context of an area, in accordance with Policy D2. | Historic England | Clarification |
| MSC.2.8 | SD1  Paragraph 2.1.6 | 2.1.6 …In order to meet London’s needs and ensure sustainable development, all stakeholders should seek to proactively promote and enable growth in these areas in line with the polic**i**es in this Plan… |  | Factual correction |
| MSC.2.9 | SD1  Paragraph 2.1.7 | 2.1.7 The key growth corridors within London are set out below. Policy SD2 Collaboration in the Wider South East and Figure 2.15 include Strategic Infrastructure Priorities that link into the wider city region. The Mayor will work with authorities outside London on the cross-boundary implications of Opportunity Areas. | SESL | Clarification |
| MSC.2.10 | SD1  Paragraph 2.1.10 | 2.1.10 The Mayor’s Transport Strategy seeks to ensure that dedicated public transport and walking and cycling provision are at the heart of planning for Opportunity Areas. It sets out that the Mayor will support growth in Opportunity Areas through transport investment and planning, and commits to the setting of sets ambitious mode share targets. |  | Readability |
| MSC.2.11 | SD1  Paragraph 2.1.11 | 2.1.11 …... The development value in these areas can, in some cases, also contribute to the funding of the schemes. In order to support these priorities, thise Plan sets out further guidance on these specific Opportunity Areas below, grouped by growth corridor………………………. |  | Readability |
| MSC.2.12 | SD1  Paragraph 2.1.11 | 2.1.11…………..Where development proposals are emerging and transport investment is not yet fully secured, delivery of the long- term capacity for homes and jobs will need to be phased in a way that maximises the benefits fromof major infrastructure and services investment whilst avoiding any unacceptable effects on existing infrastructure before the new infrastructure is available.schemes are delivered. |  | Readability |
| MSC.2.13 | Table 2.1 | *Insert new table*  Table 2.1 - **Opportunity Area Indicative guidelines for new homes and jobs**  *See Extract* | LB Islington, LB Lambeth, LB Hackney, LB Wandsworth, Just Space, HB Reavis ltd | Readability |
| MSC.2.14 | SD1  Paragraph 2.1.16 | 2.1.16 …….. The proposal for ~~an extension of the~~ **a** Bakerloo Line **Extension station** at New Cross Gate will enable delivery of these developments and improvements. The area has an established commercial centre capable of supporting commercial expansion and diversification, building on the existing assets such as Goldsmiths College, University of London ~~and the emerging~~ **areas of** artistic and cultural character. Development should improve north-south connections and pedestrian and cycling movement across **and along** the traffic**-**dominated New Cross Road (A2) as well as connectivity between New Cross Gate and surrounding communities. | LB Lewisham | Readability |
| MSC.2.15 | SD1  Paragraph 2.1.18 | 2.1.18……. To support the area, approximately 2,700 new homes can be accommodated in the heart of the town centre. The realignment of the A205 will assist in the transformation of the town centre. | LB Lewisham | Readability |
| MSC.2.16 | SD1  Paragraph 2.1.22 | 2.1.22 In particular it identified four areas where there is scope for significant change:  ……   * Norbiton, London Road and Cambridge Road Estate | RB Kingston | Clarification |
| MSC.2.17 | SD1  Paragraph 2.1.23 | 2.1.23 … It should also explore how the use of industrial land can be intensified to make more efficient use of land. Kingston town centre, with its ancient market is rich in heritage and forms an important part of the setting of Hampton Court Palace, its gardens, the Thames and surrounding Royal Parks. | Historic England, RB of Kingston, Kingston First | Clarification |
| MSC.2.18 | SD1 Paragraph 2.1.24 | 2.1.14 In the longer term, and in line with the opening of Crossrail 2 in 2033, there may be potential to accommodate growth in the following areas:   * Berrylands Station and Hogsmill Valley | RB Kingston | Clarification |
| MSC.2.19 | SD1 Paragraph 2.1.26 | 2.1.26 Clapham Junction is Europe’s busiest rail interchange station, and a designated Major town centre. serving key commuter routes from West London and Southern England, and is identified as one of London’s four strategic interchanges expected to accommodate rising levels of demand. However, the station is already operating at capacity in terms of rail services and passenger numbers and suffers from over-crowding at peak times. Reconfiguration of the existing rail infrastructure and the station is needed to increase capacity and substantially improve passengers’ public transport experience*.*  The proposal for a Crossrail 2 station represents a unique opportunity to make more efficient use of land surrounding the station for residential and commercial development, including new offices as part of the designated Major town centre. The station suffers from over-crowding at peak times, and requires significant investment to allow it to accommodate future growth in passenger numbers. … | Network Rail, Innova | Clarification |
| MSC.2.20 | SD1 Paragraph 2.1.33 | 2.1.33…. It should also set out how site assembly and provision of better links with the town centre and surrounding areas including Alexandra Palace and Alexandra Park hold the key to comprehensive development. | LB Haringey | Clarification |
| MSC.2.21 | SD1 Paragraph 2.1.49 | 2.1.49 The Planning Framework should also set out how to manage the opportunities for mixed-use development at Canning Town/West Ham, and Thameside West where there is or will be excellent public transport connectivity. Silo D is a heritage asset at risk which provides opportunities for heritage and cultural-led regeneration. | Historic England | Clarification |
| MSC.2.22 | SD1 Paragraph 2.1.54 | 2.1.54 …The Planning Framework should ensure that there is no net loss of industrial floorspace capacity, and that industrial uses are retained and intensified, and form part of the mix in redevelopment proposals. Belvedere is recognised as having potential as a future District centre. | Bexley | Factual correction |
| MSC.2.23 | SD1 Paragraph 2.1.57 | 2.1.57 ………. A Local Plan has been published which recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners. Positive masterplanning will be used to create an attractive new town centre with distinctive character. | Historic England | Clarification |
| MSC.2.24 | SD1 Paragraph 2.1.60 | 2.1.60 The Elizabeth Line will open in 2019 and transform connectivity along the route. It is already leading to increased development in central London and has the potential to bring forward growth and development from Stratford eastwards. This includes the area of the London Legacy Development Corporation, which continues to secure the legacy of the 2012 Olympic and Paralympic Games. | London Assembly Planning Committee | Clarification |
| MSC.2.25 | SD1 Paragraph 2.1.64A | *Insert new paragraph 2.1.64A*  2.1.64A The Great West Corridor is one of London’s key approaches and presents unique opportunities for place-making. It inspired high-quality Art Deco architecture in the 1930s, creating a distinctive local character. The route is surrounded by some of London’s most significant historic landscapes including the River Thames, Syon Park, Gunnersbury Park, Osterley Park and The Royal Botanic Gardens Kew World Heritage Site. Masterplanning in the corridor should carefully consider these natural and historic assets, utilising the latest modelling techniques. The opportunities to integrate and draw inspiration from the area’s heritage should be fully explored. | Historic England | Clarification |
| MSC.2.26 | Figure 2.11 | *Map to be amended*  Figure 2.11 - Central London |  | Factual |
| MSC.2.27 | Figure 2.12 | **Trams Triangle** |  | Factual correction |
| MSC.2.28 | SD2 B | B To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE partners to ensure that plan-making is, as far as possible, informed by **up-to-date,** consistent technical evidence **and monitoring.** | Barton Wilmore for developer consortium, Surrey and other county councils | Clarification |
| MSC.2.29 | SD2 E | E ….the need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality**, biodiversity** and **green infrastructure**)**,** and waste management, (~~including~~ **and** the promotion of Circular Economies**)**; wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved. | Environment Agency, Natural England, Many environmental organisations, Kent County Council, Bucks Districts and London Waste and Recycling Partnership | Clarification |
| MSC.2.30 | SD2 Paragraph 2.2.1 | 2.2.1 London is not an island. There are 130 authorities in the WSE outside London. |  | Factual |
| MSC.2.31 | SD2 Paragraph 2.2.5 | 2.2.5 …..Opportunities to collaborate should be considered where **mutual benefits** can be achieved. **The scope of these opportunities may vary depending on circumstances including proximity to London.** The promotion of good links to/from potential employment locations outside London by the Mayor to help realise corresponding employment opportunities within and outside London is an example of ~~such~~ **how** mutual benefits **can be achieved. The Golden Triangle (life science sector collaboration with Oxford and Cambridge) and the Thames Estuary Production Corridor (delivering large-scale cultural infrastructure) are good examples of collaboration that is already underway.** | Authorities outside London | Clarifications |
| MSC.2.32 | SD2 Paragraph 2.2.6 | 2.2.6 The **non-statutory strategic** structure **for cooperation that is in place** complements the GLA Act requirement for the spatial development strategy to address matters of strategic importance to Greater London (GLA Act, VIII, S.334 (5)) and the **Mayor’s statutory Duties to Inform and Consult** (GLA Act, VIII, S.335 ‘with adjoining counties and districts’, S.339 ‘authorities outside London’, S.348 ‘authorities in the vicinity of London’). |  | Clarification |
| MSC.2.33 | SD2 Paragraph 2.2.7 Footnote 8. | 2.2.7 …….. In addition, Planning Practice Guidance states that ‘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’. **The Mayor will share his responses to Local Plans outside the capital with interested London boroughs.**  *Amend footnote 8 as follows:*  NPPG – Paragraph: 007 ~~Reference ID: 9-007-20140306~~ **‘Duty to Cooperate’ (DCLG, 6 March 2014)** [**https://www.gov.uk/guidance/duty-to-cooperate**](https://www.gov.uk/guidance/duty-to-cooperate) | Developers, London Forum of Amenity and Civic Societies | Clarification |
| MSC.2.34 | SD2 Paragraph 2.2.8 | 2.2.8…. However, locally-**specific cross-border matters** between individual London boroughs and authorities beyond London ~~may~~ **should** be addressed most effectively by the relevant local authorities on the basis of their Duties to Cooperate. | London Forum of Amenity and Civic Societies | Clarification |
| MSC.2.35 | SD3 A | A The Mayor will work ~~with relevant WSE partners~~ **strategic and local authorities,** Government and other ~~agencies~~ **interested partners** to realise the growth potential of the ~~wider city region~~ **WSE** and beyond through investment in strategic infrastructure to support housing and business development **in particular** in growth locations to meet need and secure mutual benefits for London and relevant partners. | Barton Wilmore on behalf of consortium of developers | Clarification and readability |
| MSC.2.36 | SD3 B | B The Mayor supports recognition of these growth locations with links to London in relevant Local Plans **outside London**. |  | Factual |
| MSC.2.37 | SD3 Paragraph 2.3.1 | 2.3.1 This Plan aims to accommodate ~~all~~ **the vast majority** of **London’s growth** within its boundaries without intruding on its Green Belt or other protected open spaces. |  | Clarification |
| MSC.2.38 | SD3Paragraph 2.3.3 | 2.3.3 The GLA’s new **Strategic Housing Market Assessment** shows that London has a need for approximately 66,000 additional homes a year. The **new** Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this. |  | Clarification |
| MSC.2.39 | SD3  Paragraph 2.3.4 | 2.3.4 ~~Despite~~ **Although** this Plan **is** seeking to accommodate the vast majority of London’s future growth **within its boundary**~~, some migration will continue g~~**Given** the pressure for growth in both London and the WSE, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to **also** plan for longer-term contingencies. Therefore, the Mayor is interested in **working with willing partners** beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital. | Authorities outside London | Clarification and readability |
| MSC.2.40 | SD3  Paragraph 2.3.5  Footnote 9 | 2.3.5… Recognising that investment in public transport can often bring significant benefits to wider areas, such partnerships could focus on optimising rail capacity between London, the wider region and beyond. **Crossrail 2 and HS2** are examples with such potential. Another area of focus could be proposals for new/garden settlements with good links to London. Government has already indicated support for a similar approach.  *Amend footnote 9 as follows:*  Locally-led Garden Villages, Towns and Cities (DCLG, March 2016) [**https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/508205/Locally-led\_garden\_villages\_\_towns\_and\_cities.pdf**](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages__towns_and_cities.pdf) | Authorities outside London | Clarification |
| MSC.2.41 | SD3  Paragraph 2.3.6 | ~~2.3.6~~ *Moved* | Authorities outside London | Clarification |
| MSC.2.42 | SD3  Paragraph 2.3.7 | 2.3.7…The Mayor will work with key willing partners, including local authorities, Local Enterprise Partnerships, **Sub-national Transport Bodies**, the National Infrastructure Commission and Government, to explore strategic growth opportunities where planning and delivery of strategic infrastructure (in particular public transport) improvements can unlock development that supports the wider city region. |  | Clarification |
| MSC.2.43 | SD3  Paragraph 2.3.8 | 2.3.8 It will be important to ensure that growth in the WSE contributes to local vibrancy and economic activity at all times of the day and week, and that the scale of planned growth is proportional to public transport capacity in the area. Where appropriate, **the Mayor will respond to Local Plans outside London and** support ~~for example~~ Memoranda of Understanding **or other mechanisms** to formalise partnership agreements/commitments between relevant authorities. |  | Clarification |
| MSC.2.44 | SD3  Paragraph **2.3.8A** | *Insert new paragraph 2.3.8A*  **2.3.8A** ……. The remaining five are orbital priorities that can help reduce transit through London and stimulate the WSE economy beyond the capital. **The schemes within these areas are at different planning stages. Their delivery will have to be phased.** ~~Some of these orbital priorities may have more capacity to accommodate additional growth than the radial ones.~~ | Barton Wilmore for developer consortium and authorities outside London | Clarification |
| MSC.2.45 | SD4 F | F The vitality and viability of the international shopping and leisure destinations of the West End **(including Oxford Street, Regent Street, Bond Street and the wider West End Retail and Leisure Special Policy Area)** and Knightsbridge together with other CAZ retail clusters should be supported. | Westminster City Council, London Property Alliance | Clarification – for consistency with paragraph 2.4.10B |
| MSC.2.46 | SD4 H | H The attractiveness **and inclusiveness** of the CAZ to residents, visitors and businesses should be enhanced**, including** through public realm improvements and the reduction of traffic dominance, as part of the Healthy Streets Approach (see Policy T2 Healthy Streets). | The Access Association, City of London Corporation | Clarification |
| MSC.2.47 | SD4 K | K The attractions of predominantly residential neighbourhoods, where more local uses predominate, should be conserved **and enhanced**. | Westminster City Council | Clarification |
| MSC.2.48 | SD4 M | M Sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions within or close to the CAZ and ~~Northern~~ Isle of Dogs **(North)** to support the needs of businesses and activities within these areas. | LB Tower Hamlets | Clarification |
| MSC.2.49 | SD4 N | N In Development Plans, boroughs should:  1) define the detailed boundar**ies**~~y~~ of the CAZ**, the Isle of Dogs (North), town centres (including the International centres), CAZ retail clusters, Special Policy Areas** and specialist clusters of strategic functions having regard to the CAZ Diagram shown in Figure 2.16  2) develop locally sensitive policies to meet this Plan’s objectives for the CAZ  ~~3)~~ define the detailed boundaries of the CAZ satellite and reserve locations. | West End Partnership, Grosvenor Britain, Ireland, Covent Garden Community Association and Get Living London | Clarification |
| MSC.2.50 | SD4  Paragraph 2.4.3  Footnote 10 and 11 | 2.4.3 For the purposes of CAZ policies, the ~~Northern~~ Isle of Dogs **(North)** (~~N~~IOD**N**) is recognised as a CAZ ‘satellite’10 location for world city office functions. Future potential reserve11 locations for CAZ office functions are Stratford and Old Oak Common  *Amend footnotes 10 and 11*  10 The term ‘satellite’ is used to indicate that the ~~N~~IOD**N** is geographically separate from the CAZ but it is treated as part of the CAZ in London Plan policy  11 These locations are **not formally within the CAZ and are** identified as future strategic reserves for nationally significant office functions in the event that future demand for office space exceeds development capacity in the CAZ. **Specific policy directions for Stratford and Old Oak Common are contained within supporting text to Policy SD1 (Opportunity Areas) and Annex 1 (Town Centre Network).** | LB Tower Hamlets, LB Newham, East of England Local Government Association, Local London Partnership and Get Living London | Clarification |
| MSC.2.51 | SD4  Paragraph 2.4.4A | *Insert new paragraph 2.4.4A*  **2.4.4A Development Plans should set out the appropriate balance between the various CAZ strategic functions in different parts of the CAZ having regard to local circumstances.** | LB Islington, City of London Corporation, Covent Garden Community Association | Clarification |
| MSC.2.52 | SD4  Paragraph 2.4.5A | *Insert new paragraph 2.4.4A*  **2.4.5A The City of London and the Isle of Dogs (North) are nationally important locations for globally-oriented financial and business services. The West End is a vibrant mixed-use business location, an internationally-renowned shopping, cultural and visitor destination and home to several world-leading academic institutions as well as a significant residential population. The unique roles of these locations and their strategic contribution to the economy, culture and identity of the capital should be promoted and enhanced.** | London First, London Property Alliance, West End Partnership, Grosvenor Britain & Ireland, Capco Covent Garden, New West End Company, Crown Estate, Landsec, Heart of London Business Alliance | Clarification |
| MSC.2.53 | SD4  Paragraph 2.4.7 Footnote 14. | 2.4.7 The distinct environment and heritage of the CAZ should be sustained and enhanced through development decisions, Local Plans and other initiatives14 such as the transformation of **the** Oxford Street **district**.  14 Mayor’s Environment Strategy 201**8**~~7~~ | West End Partnership, Grosvenor Britain & Ireland, London First, London Property Alliance | Clarification |
| MSC.2.54 | SD4  Paragraph 2.4.8 Footnote 15 | 15 Mayor’s Environment Strategy 201**8**~~7~~  Details on the TfL website: https://tfl.gov.uk/modes/driving/emissions-surcharge, https://tfl.gov.uk/modes/driving/ultra-low-emission-zone; See also the Mayor’s Environment Strategy 201**8**~~7~~. |  | Factual update. |
| MSC.2.55 | SD4  Paragraph 2.4.10 | 2.4.10 ….. It contains a range of unique centres and mixed-use clusters with a predominant retail function which perform different roles in the wider London Plan town centre network (see **Policy SD8** Town ~~C~~**c**entre **network** ~~policies~~) including: … |  | Clarification |
| MSC.2.56 | SD4  Paragraph 2.4.11 | 2.4.11…. Within this context the vitality and viability of the international shopping centres and other CAZ retail clusters above should be enhanced**, supporting their adaptation and diversification,** along with improvements to the quality of the environment and public realm. | London First, London Property Alliance, New West End Company, Crown Estate, Grosvenor Britain & Ireland, Capco Covent Garden, Heart of London Business Alliance | Clarification |
| MSC.2.57 | SD4  Paragraph 2.4.12  New footnote 16A | 2.4.12 The CAZ contains several other important specialist clusters of activity which contribute towards the capital’s international and national roles. These clusters ~~include~~ **contain significant concentrations of** **strategic** functions of **arts and culture,** state, health, law and education and are represented spatially in the CAZ Diagram (Figure2.16) ……….. the Welcome Trust and the Francis Crick Institute (and on the CAZ fringe**16A** at Whitechapel and White City).  *Insert new footnote 16A*  **16AThe CAZ fringe refers to areas that have a functional relationship with the CAZ and lie within reasonable proximity to the CAZ but do not lie within the Zone itself** | London Property Alliance, LB Tower Hamlets | Clarification |
| MSC.2.58 | SD4  Paragraph 2.4.13 | 2.4.13 Special Policy Areas **are supported,** ~~may be defined locally in specific and exceptional circumstances~~ **particularly** where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to London’s unique identity, economic function or cultural heritage. | Westminster City Council, Just Space | Clarification |
| MSC.2.59 | SD4  Paragraph 2.4.13 | 2.4.13…….Given the operation of the Use Classes Order and permitted development rights, Special Policy Areas often require the collaboration of landowners to achieve their objectives. ~~They should only be defined in the above exceptional circumstances to avoid stifling innovation and change that is one of the defining features of the CAZ.~~ | Westminster City Council, Just Space | Clarification |
| MSC.2.60 | SD4  Figure 2.16 | *MAP TO BE AMENDED*  Figure 2.16 – CAZ Diagram |  | Factual Update |
| MSC.2.61 | SD4  Figure 2.16 | Insert the indicative area of the ‘West End’ (to match the indicative boundary in the West End Partnership vision).  Refinement to the area covered by the West End cluster of Arts, culture and entertainment and amend key to read:  ‘1. West End **(including Soho/Covent Garden)’.** | West End Partnership | Clarification |
| MSC.2.62 | SD4  Figure 2.16 | Minor refinement to the indicative area of the Victoria Opportunity Area | London Property Alliance, Landsec | Clarification |
| MSC.2.63 | SD4  Figure 2.16 | Minor refinement to the indicative area of the Isle of Dogs (North) | Individual | Clarification of the indicative area covered by the Isle of Dogs (North). |
| MSC.2.64 | SD4  Figure 2.16 | Amend key: **Retail clusters and** Town Centres |  | Consistency |
| MSC.2.65 | Figure 2.16 | Amend key: 3 King’s Cross ~~– St. Pancreas~~ | LB Camden | Consistency |
| MSC.2.66 | Figure 2.16 | Amend key: 9 London Bridge~~, Borough and~~ Bankside |  | Consistency |
| MSC.2.67 | SD4  Paragraph 2.4.15 | 2.4.15 Digital connectivity and associated infrastructure is a key consideration in the CAZ where densities of commercial development in particular are high. Where necessary, ~~applicants~~ **development proposals** should seek to aggregate demand in areas not currently served by high-speed connectivity and liaise jointly with providers to ensure that infrastructure requirements can be planned and delivered appropriately (see Policy SI6 Digital connectivity infrastructure). | London Forum of Civic and Amenity Societies | Clarification |
| MSC.2.68 | SD4  Paragraph 2.4.16 | 2.4.16 Local Plans and development proposals should respond to issues related to climate change taking into account the distinct circumstances of the CAZ including the urban heat island effect (whereby the CAZ suffers from higher local temperatures than surrounding parts of London) and its vulnerability to ~~surface water~~ **flooding** due to low-lying land and the high proportion of impermeable surfaces. | Environment Agency | Clarification |
| MSC.2.69 | SD5 B | B Residential development is not appropriate in **defined parts** ~~the commercial core~~ of the City of London and Northern Isle of Dogs (detailed boundaries to be defined by boroughs in Development Plans). | City of London Corporation | Clarification |
| MSC.2.70 | SD5 C and D | *Deletion of clauses C 1 – C 5*  *Clauses D 1 and D 2 are combined*  C Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in **all** other ~~core commercial~~ areas of the CAZ **except** ~~including~~:  ~~1)~~ ~~other parts of the City of London and Northern Isle of Dogs (outside core areas in part B above)~~  ~~2) the West End, Knightsbridge and other core commercial areas in the City of Westminster including Soho, Covent Garden, its Opportunity Areas and commercial parts of Marylebone and Fitzrovia~~  ~~3) commercial core areas identified in the City Fringe/Tech City Opportunity Area Planning Framework~~  ~~4) all other Opportunity Areas (except Vauxhall, Nine Elms, Battersea and Elephant & Castle)~~  ~~5) identified clusters of specialist CAZ strategic functions, CAZ retail clusters and locally identified Special Policy Areas.~~  ~~D~~ ~~offices and other CAZ strategic functions are given equal weight relative to new residential in other parts of the CAZ not covered in parts B or C above including:~~  1) **the** Vauxhall, Nine Elms, Battersea ~~Opportunity Area~~ **and the**  ~~2)~~ Elephant & Castle Opportunity Areas, where offices and other CAZ strategic functions are given equal weight relative to new residential; and  3) **wholly residential streets or** predominantly residential neighbourhoods ~~or wholly residential streets~~ (with exceptions in appropriate circumstances – for example clusters of specialist CAZ strategic functions, Special Policy Areas and CAZ retail clusters). | LB Islington, LB Tower Hamlets, LB Camden, Westminster City Council, Heart of London Business Alliance, London Forum of Civic and Amenity Societies, London Property Alliance, Unite Students, Drew, Stevenson | Clarification to simplify the provisions of SD5 Parts C and D. |
| MSC.2.71 | SD5 E | E In Development Plans, boroughs should develop local policies and define detailed boundaries for the areas in parts B**~~,~~ and** C ~~and D~~ above. |  | Consistency |
| MSC.2.72 | SD5 H | H Residential **or mixed-use** development proposals should not lead to a **net** loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices**.** ~~and/or~~ **To achieve this,** alternative provision ~~is made for the provision~~ of **equivalent or** net additional office space **can be made** ~~near the development~~ (including through swaps and credits – see part I below). **This should be within the CAZ and near the development.** | Canary Wharf Group | Clarification |
| MSC.2.73 | SD5  Paragraph 2.5.3 | 2.5.3 The agglomerations of offices and other CAZ strategic functions should not be compromised by new residential development. Given their strategic importance, as a general principle, offices and other CAZ strategic functions are given greater weight relative to new residential development in the Zone (with exceptions set out in policy). ~~In particular, r~~ Residential development is considered inappropriate in defined parts ~~the commercial core areas~~ of the City of London and Northern Isle of Dogs reflecting the prominent role of these locations in providing capacity for world city business functions. This policy will ensure that the current and future potential to assemble and deliver office development in these locations is not compromised by residential development. | City of London Corporation | Clarification |
| MSC.2.74 | SD5  Paragraph 2.5.4 | ~~2.5.4 Offices and other CAZ strategic functions are given greater weight relative to new residential development in the West End and other core commercial areas of the CAZ reflecting the importance attached to CAZ strategic functions in these locations.~~ |  | Text moved to paragraph 2.5.3 and consistency |
| MSC.2.75 | SD5  Paragraph 2.5.6 | 2.5.6 Development Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate. **Evidence required to demonstrate no reasonable prospect of a site being used for offices is set out in paragraph 6.1.7 of this Plan.** | Federation of Small Businesses | Clarification |
| MSC.2.76 | SD5  Paragraph 2.5.8 | 2.5.8 Land use swaps~~,~~ and credits ~~and off-site contributions~~can be used to support local balances between CAZ strategic functions and housing. |  | Clarification |
| MSC.2.77 | SD6 Title | **Policy SD6 Town centres** **and high streets** | Vital OKR, Federation of Master Builders | Clarification |
| MSC.2.78 | SD6 A 1 | A The vitality and viability of London’s varied town centres ~~and their vitality and viability~~ should be promoted and enhanced ~~as~~ by:  1) encouraging strong, resilient, accessible**~~,~~ and** inclusive and viable hubs ~~for~~ **with** a diverse range of uses that meet the needs of Londoners, including main town centre uses, ~~including employment, business space, shopping, culture, leisure,~~ night-time economy, ~~tourism,~~ civic, community, social infrastructure and residential development uses | Crest Nicholson PLC, London Assembly Planning Committee | Clarification and Readability |
| MSC.2.79 | SD6 A 2 | A The vitality and viability of London’s varied town centres ~~and their vitality and viability~~ should be promoted and enhanced ~~as~~ by:..  2) **identifying** locations for mixed-use or housing-led intensification ~~and~~ **to optimise residential growth** **potential** ~~higher-density renewal~~, securing a high-quality environment and complementing local character and heritage assets | Crest Nicholson PLC, London Assembly Planning Committee | Clarification and Readability |
| MSC.2.80 | SD6 A 3 | A The vitality and viability of London’s varied town centres ~~and their vitality and viability~~ should be promoted and enhanced ~~as~~ by:  3) ~~the structure for~~ delivering sustainable access by walking, cycling and public transport to a competitive range of services and activities by walking, cycling and public transport | Crest Nicholson PLC, London Assembly Planning Committee | Clarification and Readability |
| MSC.2.81 | SD6 A 4 | A The vitality and viability of London’s varied town centres ~~and their vitality and viability~~ should be promoted and enhanced ~~as~~ by:  4) **strengthening the role of town centres as** the **a** main focus for Londoners’ sense of place and local identity in the capital | Crest Nicholson PLC, London Assembly Planning Committee | Clarification and Readability |
| MSC.2.82 | SD6 A 5 | A The vitality and viability of London’s varied town centres ~~and their vitality and viability~~ should be promoted and enhanced ~~as~~ by:  5) **ensuring town centres are** the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy | Crest Nicholson PLC, London Assembly Planning Committee | Clarification and Readability |
| MSC.2.83 | SD6 A 6 | A The vitality and viability of London’s varied town centres ~~and their vitality and viability~~ should be promoted and enhanced ~~as~~ by:  6) ~~a key mechanism for~~ supporting the role of town centres in building sustainable, healthy**~~,~~ and** walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management | Crest Nicholson PLC, London Assembly Planning Committee | Clarification and Readability |
| MSC.2.84 | SD6 B | B The adaptation and ~~restructuring~~ **diversification** of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries. | LB Richmond Upon Thames, LB Islington | Clarification |
| MSC.2.85 | SD6 C | C The potential for new housing within and on the edges of town centres should be realised through ~~higher-density~~ mixed-use or residential development **that makes best use of land**, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. | LB Brent, LB Harrow, LB Bexley, individual | Clarification |
| MSC.2.86 | SD6 C | C ……future accessibility by public transport. Residential-only schemes in town centres may ~~be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.~~ | LB Haringey, LB Harrow, LB Southwark, LB Tower Hamlets, LB Brent, LB Islington | Clarification - text moved to supporting text |
| MSC.2.87 | SD6 D | D The particular suitability of town centres **to accommodate a diverse range of housing should be considered and encouraged, including** ~~for~~ smaller households, Build to Rent, older people’s housing and student accommodation ~~should be considered and encouraged~~. | Local London Partnership, Westminster | Clarification |
| MSC.2.88 | SD6 E | E The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see Policy E1 Offices) and the need for affordable and low-cost business space (**Policy E2: Low-cost business space,** Policy E3 Affordable workspace).… | LB Islington, LB Harrow, LB Haringey, Vital OKR | Clarification |
| MSC.2.89 | SD6 HA | *Insert new policy sub clause HA*  **HA The varied role of London’s high streets should be supported and enhanced.** | Vital OKR, Federation of Master Builders | Clarification |
| MSC.2.90 | SD6 I | I The provision of social infrastructure should be enhanced, **particularly where it is necessary to support identified need from town centre and local residents,** and facilities should be located in places that maximise footfall to surrounding town centre uses. | London Assembly Planning Committee | Clarification |
| MSC.2.91 | SD6  Paragraph 2.6.1 | 2.6.1 London’s town centres are central to the lives of Londoners. They provide a focus for the local community, both geographically and in relation to the sense of identity and broad mix of uses they provide. **Policy SD6 Town centres and high streets does not apply to CAZ Retail Clusters or any town centres located wholly within the Central Activities Zone (CAZ).**  **19A - Policy SD6 Town centres and high streets applies to the entirety of Angel town centre and Elephant and Castle town centre.** | City of London Corporation, Westminster City Council | Clarification |
| MSC.2.92 | SD6  Paragraph 2.6.1A | *Paragraphs 2.6.1 is split into two paragraphs.*    **2.6.1A** The spaces within and around town centres have an important public function, with high streets, public squares, markets, parks, gardens…….. |  |  |
| MSC.2.93 | SD6  Paragraph 2.6.1B | **2.6.1B High streets are one of London’s most characteristic urban features which play an important role in terms of local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange. The character and function of high streets within town centres should be promoted and enhanced.** | Vital OKR, Federation of Master Builders | Clarification |
| MSC.2.94 | SD6  Paragraph 2.6.2 | 2.6.2 **Over the years** ~~T~~**t**own centres have ~~over the years~~ absorbed change and new technologies. To continue to thrive they will need to evolve and diversify in response to current and |  | Clarification and Readability |
| MSC.2.95 | SD6  Paragraph 2.6.2 | 2.6.2….This need for adaptation and diversification, together with their good public transport accessibility, makes many town centres appropriate locations for residential-led **intensification** or mixed-use ~~high-density~~ development **that makes best use of land**. | LB Brent, LB Harrow, LB Bexley | Clarification |
| MSC.2.96 | SD6  Paragraph 2.6.4A | *Insert new paragraph 2.6.4A*  **2.6.4A Residential development plays an important role in ensuring town centre vitality, particularly through the delivery of diverse housing. Residential-only schemes in town centres may be appropriate outside the primary shopping area and primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.** | Silvertown Homes, Redrow Homes London Division | Clarification |
| MSC.2.97 | SD7 and SD8 | *Policies SD7 and SD8 have been swapped* | City of London Corp, LB Southwark | Readability - SD6 and current SD8 do not apply to Town Centres located wholly within the CAZ. |
| MSC.2.98 | SD~~8~~**7** | Policy SD~~8~~7 Town centres: development principles and Development Plan Documents | City of London Corp, LB Southwark |  |
| MSC.2.99 | SD~~8~~**7** A 1 | A Development Plans and development proposals should take a town centres first approach by:  1) ~~adopting a~~ **applying the** sequential ~~approach~~ **test** to **applications for** ~~accommodating~~ **main** town centre uses**,** ~~including retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused~~ **locating them** ~~on sites with~~in town centres**,** ~~or~~ **then** (if no sites are available, suitable or viable) on sites on the edge~~s~~ of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport | Galliard Homes, LB Tower Hamlets, Halfords, LB Islington | Clarification and readability |
| MSC.2.100 | SD~~8~~**7** A 2 | A Development Plans and development proposals should take a town centres first approach by  2)  ~~firmly resisting~~ **discouraging** out-of-centre development… | Ministry of Housing, Communities and Local Government, Lidl UK GmbH, Halfords, Sainsburys Supermarkets Ltd, Silvertown Homes, London Hotel Group, Next Plc | Clarification |
| MSC.2.101 | SD~~8~~**7** A 2 | A Development Plans and development proposals should take a town centres first approach by:  2)… main town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices) | Galliard Homes LB Tower Hamlets, Halfords | Clarification |
| MSC.2.102 | SD~~8~~**7** A 3 | A Development Plans and development proposals should take a town centres first approach by:  3) providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre retail, leisure and office uses in part A(1) above that are not in accordance with the Development Plan | LB Tower Hamlets | Clarification |
| MSC.2.103 | SD~~8~~**7** B **1A** | *Insert new clause B 1A:*  B In Development Plans, boroughs should:  **1A) consider the protection of out-of-centre high streets as neighbourhood centres, local parades or business areas and develop appropriate policies to support and enhance the role of these high street****s, subject to local evidence, recognising the capacity of low-density commercial sites, car parks and retail parks for housing intensification and mixed-use redevelopment (see Policy H1 Increasing housing supply)** | London Assembly Planning Committee, Just Space | Clarification |
| MSC.2.104 | SD~~8~~**7** B 2 | B In Development Plans, boroughs should:  2) develop policies through strategic and local partnership approaches (Policy SD9 Town centres: Local partnerships and implementation) to meet the objectives for town centres set out in Policy SD6 Town centres **and high streets** to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network (Policy SD~~7~~**8** Town centre network) |  | Factual update |
| MSC.2.105 | SD~~8~~**7** B 3 | B In Development Plans, boroughs should:  3) develop policies for ~~the~~ edge ~~and fringes~~ of town centre~~s~~ **areas**, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses ~~particularly in secondary frontages~~ taking into account local circumstances | Halfords, LB Tower Hamlets | Clarification |
| MSC.2.106 | SD~~8~~**7** B 4 **dA** | *New policy B 4) dA):*  B In Development Plans, boroughs should:  4) ..Criteria to consider in assessing the potential for intensification in town centres include:..  **dA) capacity and proximity of social infrastructure** | LB Redbridge, individuals | Clarification |
| MSC.2.107 | Paragraph 2.87.1  New footnote 21A | 2.87.1 …In order to support the vitality of town centres, it is important to take a sequential approach, focusing on sites within town centres before considering edge-of-centre sites. This ensures that town centre uses are not unnecessarily dispersed, maximises the overall growth potential of town centres and promotes investment in high streets and primary shopping frontages. **Policy SD7 Town centres: development principles and Development Plan Documents does not apply to CAZ Retail Clusters or any town centres located wholly within the Central Activities Zone (CAZ)21A.**  *Insert new footnote 21A*  **21A Policy SD7 Town centres: development principles and Development Plan Documents applies to the entirety of Angel town centre and Elephant and Castle town centre.** | City of London Corporation, Westminster City Council | Clarification |
| MSC.2.108 | Paragraph 2. 87.2 | 2. 87.2 Where **edge-of-centre** developments ~~of town centre~~ **retail, leisure and office** uses are proposed, and are not in accordance with the Development Plan, these should be accompanied by a robust and detailed impact assessment. This applies to ~~retail, leisure and office~~ development greater than **a locally set floorspace threshold**, or 2,500 sq m **if a local floorspace threshold has not been set.** | LB Hackney, LB Tower Hamlets | Clarification |
| MSC.2.109 | Paragraph 2. 87.4 | 2. 87.4The **location, design, type, and level of fit-out** of commercial uses, particularly those in mixed-use development, should support the town centres first approach and ensure that commercial premises make a positive contribution to the vitality of the area and are quickly occupied. ~~Out-of-centre housing-led developments should seek to maximise the provision of housing and create active frontages and welcoming streetscapes through the provision of ground floor windows, front doors and front gardens where appropriate.~~ | LB Westminster | Clarification and Readability |
| MSC.2.110 | SD~~7~~**8** Title | Policy SD7 **8** Town centre network |  | Readability - SD6 and current SD8 do not apply to Town Centres located wholly within the CAZ. |
| MSC.2.111 | SD~~7~~**8** B | B Identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level in the network, designating new centres (see Annex 1) or reassessing town centre boundaries (see Policy SD~~8~~**7** Town centres: development principles and Development Plan Documents). **Diversification in** ~~C~~**c**entres with current or projected declining demand for commercial, particularly retail, floorspace **should be supported. These centres** may be reclassified at a lower level in the hierarchy **through a coordinated approach with local planning authorities**. | LB Harrow | Clarification |
| MSC.2.112 | SD~~7~~**8** C | C The classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan. Potential future changes to the strategic town centre network are set out in Figure A1.1 in Annex 1. Changes to District, Local~~, and~~ Neighbourhood centres **and CAZ Retail Clusters** can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate (see Policy SD~~8~~**7** Town centres: development principles and Development Plan Documents). | City of London Corporation | Clarification |
| MSC.2.113 | SD~~7~~**8** E | E District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, **social infrastructure,** local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment. | Levitt Bernstein | Clarification |
| MSC.2.114 | Paragraph 2. 78.4 | 2. 78.4 ~~These~~ ~~c~~**C**entres **with a future potential network classification in Table A1.1 (Town Centre Network)** are not recommended for immediate reclassification, however it is recognised that they may be appropriate for future reclassification, subject to strategic and Local Plan policies and conditional on matters such as capacity analysis, impact assessments, land use, public transport, walking and cycling, planning approvals and full implementation. | London Forum of Amenity and Civic Societies | Clarification |
| MSC.2.115 | Paragraph 2. 78.4 | 2. 78.4 …Many of the areas identified as future potential town centres, and centres with the potential to be reclassified at a higher level in the town centre hierarchy (see Annex 1), currently contain retail parks, dominated by large format stores and heavily reliant on travel by car. For these areas to be reclassified, a clear strategy should be developed and implemented (see Policy SD9 Town centres: Local partnerships and implementation) that secures a broader mix of store sizes and formats and a variety of town centre uses including retail, leisure, employment and social infrastructure, subject to demand, capacity and impact. |  | Clarification |
| MSC.2.116 | Figure 2.17 | Figure 2.17 to be updated to align with changes to Table A1.1 in Annex One. |  | Alignment with suggested changes to Annex One. |
| MSC.2.117 | SD9 A | A **Strategic and local partnership approaches should be supported and encouraged T**~~t~~o develop strong, resilient and adaptable town centres, fulfilling their ~~full~~ potential to accommodate growth and development~~., strategic and local partnership approaches, community engagement,~~ **These partnerships may be in the form of** town centre management, business associations, **Neighbourhood Forums, trader associations** and Business Improvement Districts, **and should be inclusive and representative of the local community.** ~~should be supported and encouraged. Each town centre should have a Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.~~ | Green Party Group, London Forum of Amenity and Civic Societies | Clarification |
| MSC.2.118 | SD9 AA | *Insert new policy sub-clause AA*  **AA The development of Town Centre Strategies is encouraged, particularly for centres that are undergoing transformative change, have projected declining demand, have significant infrastructure planned or are identified as future potential centres in Table A1.1. Town Centre Strategies should be produced in partnership at the local level in a way that is inclusive and representative of the local community.** | LB Camden, LB Bexley, LB Havering, LB Bromley, LB Redbridge, LB Southwark, Westminster City Council, LB Croydon | Clarification |
| MSC.2.119 | SD9  Paragraph 2.9.1 | 2.9.1 ……..All town centres, however, will change – many of them significantly – due to the restructuring of the retail sector and other changes in the wider economy.~~…It is therefore crucial that a~~ **A** **strategy** ~~is~~ **should therefore be developed for** ~~each~~ **town centres that are experiencing significant change, such as projected declining demand, or significant planned infrastructure, or town centres that are identified as future potential centres in Table A1.1. This is**~~,~~ **necessary** to ensure that the local community continues to be well served and that the network of town centres across London continues to function successfully. | London Boroughs | Clarification |
| MSC.2.120 | SD9 Paragraph 2.9.2 | 2.9.2 Town Centre **Strategies should be tailored to each town centre~~.~~**~~, with a~~ **A** clear vision **should be** developed with the local community, taking account of the town centre’s strategic role, opportunities for growth, ~~and~~ potential to support regeneration**, spatial characteristics, economic challenges, and location in inner or outer London**. | Individuals | Clarification |
| MSC.2.121 | SD9 Paragraph 2.9.2 | 2.9.2….. Town Centre Strategies should pay particular regard to the social **and economic** benefits of high streets ~~and~~ **as well as their function and character within** town centres, especially the formal and informal networks that support local communities**.**~~, and~~ **They** should **also** have regard to commercial and social activity that serves particular groups and communities. | Individual | Clarification |
| MSC.2.122 | SD10 A 1 | A Boroughs should:   1. identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans **and develop policies that are** based on a thorough understanding of the demographics of communities and their needs |  | Clarification |
| MSC.2.123 | SD10 A 2A | A Boroughs should:  **2A) engage communities, particularly those in Strategic and Local Areas for Regeneration, at an early stage and throughout the development of local development documents, strategies and regeneration programmes.** | London Assembly Planning Committee, Chairs of Camden's Conservation Area Advisory Committees, Camden Town CAAC, Just Space, Levitt Bernstein, Old Bermondsey Village Neighbourhood Forum, Green Party Group | Clarification |
| MSC.2.124 | SD10 Paragraph 2.10.3 | 2.10.3… By taking an integrated, spatial approach to a wide range of issues, Development Plans and Opportunity Area Planning Frameworks have a key role to play in tackling spatial inequalities and the causes of deprivation. **It is important that these are developed through engagement with local communities.** | London Assembly Planning Committee, Chairs of Camden's Conservation Area Advisory Committees, Camden Town CAAC, Just Space, Levitt Bernstein, Old Bermondsey Village Neighbourhood Forum, Green Party Group | Clarification |
| MSC.2.125 | SD10 Paragraph 2.10.4 | 2.10.4 In identifying Local Areas for Regeneration, boroughs should use their local knowledge and that of their communities to **identify and understand the particular needs of the area**. The individual measures of deprivation that make up the IMD **and other evidence** should be used to identify specific areas that are affected by particular issues, and regeneration strategies, investment and the approach taken in Local Plans should be tailored to reflect these… | London Assembly Planning Committee | Clarification |
| MSC.2.126 | SD10  Paragraph 2.10.4 | 2.10.4 … in Local Plans should be tailored to reflect these. Local Plans should **include policies that identify** ~~also look closely at~~ ~~the~~ Strategic ~~and Local~~ Areas for Regeneration and **address** the particular issues that affect them and the surrounding areas. | London Assembly Planning Committee, Chairs of Camden's Conservation Area Advisory Committees, Camden Town CAAC, Just Space, Levitt Bernstein, Old Bermondsey Village Neighbourhood Forum, Green Party Group | Clarification |
| MSC.2.127 | SD10 Paragraph 2.10.6 | 2.10.6… In order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in collaboration with local communities **and other stakeholders**, involving a broad spectrum of groups and individuals, to develop a shared vision for the area… | Canal & River Trust | Clarification |
| **Chapter 3 Design** | | | | |
| MSC.3.1 | D1 | *Policy restructure and clauses re-ordered* |  | To clarify policy meaning and structure |
| MSC.3.2 | D1 A & B | *Deleted first line of part A and B and reordered numbered and renumbered policy text in parts A and B and added three heading to group numbered policy text.*  **Form and layout**  ~~A~~1)  ~~A2)~~  ~~B1~~ **2**)  ~~A8~~ **3**)  ~~A3~~ **4**)  ~~A10~~ **5**)  **Experience**  ~~A5~~ **6**)  ~~A6~~ **7**)  ~~A4~~ **8**)  ~~A7~~ **9**)  ~~A9~~ **10**)  ~~B6~~ **11**)  **Quality and character**  ~~B4~~ **12**)  ~~B2~~ **13**)  ~~B3~~ **14**)  ~~B5~~ **15**) | London Boroughs | To clarify policy meaning and structure |
| MSC.3.3 | D1  Start of policy | *Changed initial policy text to part A and added new text*  A Development Plans, area-based strategies and development proposals should **ensure the design of places** address**es** the following **requirements:**  ~~A The form and layout of a place should:~~  ~~B Development design should:~~ | London Boroughs | To clarify policy meaning and structure |
| MSC.3.4 | D1 A 2 | *deleted A 2 and combined it with new clause A6*  ~~2) facilitate an inclusive environment~~  **Experience**  ~~A5~~ **6**) achieve safe and secure **and inclusive** environments | London Boroughs | To clarify policy meaning and structure and remove repetitive text. |
| MSC.3.5 | D1 A 2  previously B1 | **Form and layout**  ~~B1~~ **2**) ~~respond~~ **enhance** local context by delivering buildings and spaces that **positively respond to local distinctiveness through their layout, orientation,** ~~are positioned and of a~~ scale, appearance and shape**, with due regard to** ~~that responds successfully to the identity and character of the locality, including to~~ existing and emerging street | London Boroughs | Clarification |
| MSC.3.6 | D1 A 6  previously A5 | **Experience**  ~~A5~~ **6**) achieve safe and secure **and inclusive** environments | London Boroughs | Clarification |
| MSC.3.7 | D1 A 11  previously B6 | **Experience**  ~~B6~~ **11**) achieve indoor and outdoor environments that are comfortable and inviting for people to use ~~environments both inside and outside buildings.~~ | Highgate Society | Clarification |
| MSC.3.8 | D1 A 11  previously B4 | **Quality and character**  ~~B4~~ **12)** **respond to the existing character of a place by identifying the special and valued features that are unique to the locality and** respect, enhance and utilise the heritage assets and architectural features that ~~make up~~ contribute to the local character | London Boroughs, Natural England | Clarification |
| MSC.3.9 | D1 A 14  Previously B3 | **Quality and character**  ~~B3~~ **14**) aim for high sustainability standards **(with reference to the policies within London Plan Chapter’s 8 and 9)** | Environment Agency | Clarification |
| MSC.3.10 | D1  Paragraph 3.1.1A | **3.1.1A This Plan provides a policy framework for delivering Good Growth through good design. Policies D1 London’s form and characteristics and D2 Delivering good design work together to embed good design principles from the outset of the design process and ensure these are carried through to the completion of a development. Policy D1 sets out the key characteristics that should be delivered through the design of London’s buildings and spaces in terms of their form and layout, quality and character, and the user experience they provide. Throughout the period of assessment of planning applications, boroughs and applicants should cross reference between policies D1 and D2 to ensure these key design principles are addressed and carried through each stage of the planning and design process.** | London Boroughs | Clarification |
| MSC.3.11 | D1  Paragraph  3.1.1 | 3.1.1…….This means coordinating the layout of the development with the form and scale of the buildings and the location of the different land uses, and facilitating convenient pedestrian connectivity to activities and services (see also Policy D6 Optimising ~~housing~~ density). |  | Consistency |
| MSC.3.12 | D1  Paragraph  3.1.2 | *Paragraph 3.1.2 split into 3 paragraphs*  3.1.2 Developments that show a clear understanding of, and relationship with, **the** ~~context of the site~~ **distinctive features of a place** are more likely to be successful. **These features include buildings, structures, open spaces, public realm and the underlying landscape. Development should be designed to respond to the special characteristics of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value.** | London Boroughs, Natural England, Landscape Institute, L&Q,  Barratt Dev. Countryside Properties Individuals | Clarification |
| MSC.3.13 | D1  Paragraph 3.2.1A | **3.1.2A** **As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place’s distinctive character, recognising that not all elements of a place are special and valued.** |  | Clarification |
| MSC.3.14 | D1  Paragraph  3.1.2B | *Existing paragraph 3.1.2 split*  **3.1.2B** Buildings should be of high quality and enhance, activate and appropriately frame the public realm……. |  | Readability |
| MSC.3.15 | D2 A1 | A …. in preparing Development Plans and area-based strategies, which covers the following elements:  1 ) **demographic make-up and** socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics) |  | Clarification |
| MSC.3.16 | D2 B | B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form**s** of development for an area in terms of scale, height, density, layout and land uses… |  | Clarification |
| MSC.3.17 | D2 C | C Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform **plan-making** and **decision-taking, and to** engage Londoners in the planning process. | Historic England | Clarification |
| MSC.3.18 | D2 F | Design scrutiny  F **The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in the policy, local evidence, and expert advice where appropriate. In addition** **b**~~B~~oroughs and applicants should **make** use **of the** design review process to assess and inform design options early in the planning process. ~~Design review should be in addition to the borough’s planning, urban design, and conservation officers’ assessment and pre-application advice.~~ Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation, before a planning application is made, **or demonstrate that it has undergone a local borough process of design scrutiny, based on the principles set out in part G**, if they: | London Boroughs, Historic England | Clarification  . |
| MSC.3.19 | D2 F 1 | F …….if they:   1. are above the applicable density indicated in Part C of Policy D6 Optimising ~~housing~~ density; or |  | Factual Update |
| MSC.3.20 | D2 H 1 | H The design quality of development should be retained through to completion by:   1. **ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development** ~~having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments~~ | London Boroughs | Clarification |
| MSC.3.21 | D2 H 4 | H The design quality of development should be retained through to completion by:  ~~4~~) local planning authorities **considering conditioning the ongoing involvement of the original design team to monitor design quality of a development through to completion** ~~using architect retention clauses in legal agreements where appropriate~~. | Businesses  London Boroughs  Agents | Clarification |
| MSC.3.22 | D2  Paragraph  3.2.1 | 3.2.1 **Policy D1 London’s form and characteristics and Policy D2 Delivering good design should be read together. It is intended that** **t**~~T~~he processes and actions set out in Policy D2 Delivering good design will help ensure development delivers good design **as demonstrated by the principles and best practice outcomes set out in Policy D1.** | London Boroughs, Businesses, Community Groups, Agents | Clarification |
| MSC.3.23 | D2  Paragraph 3.2.2 | 3.2.2 …help inform an understanding of an area’s capacity for growth. **Figure 3.2 illustrates the broad characteristics of London as derived from its historical development, which can be used to inform evidence bases for area-based strategies.** |  | Clarification |
| MSC.3.24 | D2  Paragraph  3.2.6 | 3.2.6 The Mayor’s Design Advocates **(MDAs)** will play a key role in helping to deliver good design. They will help champion design across the GLA Group and beyond, through research, design review, capacity building, commissioning and advocacy. **MDAs are also panel members of the London Review Panel, which the Mayor has set up to provide design scrutiny. This review panel is primarily focused on the review of Mayoral investments, but can provide design review sessions for development proposals referred to the Mayor, where they have not previously been subject to review, or for schemes of particular significance.** | London Boroughs, Businesses, Agents | Clarification |
| MSC.3.25 | D2  Paragraph 3.2.7 | 3.2.7 All development proposals should ~~follow this guidance, and~~ be subject to a level of scrutiny appropriate to the scale **and/or impact** of the **project** ~~site~~. This design scrutiny should include work by planning case officers and ongoing and informal review by qualified urban design **officers** **and conservation** officers.~~as well as formal design review~~ **Development proposals required to undergo design review as set out under Part F will form a small portion of overall planning applications in London. The Mayor may require that other referable developments undergo design review. Boroughs are encouraged to use design review to support their scrutiny of development proposals.** | Businesses,  London Boroughs, Agents, Historic England | Clarification |
| MSC.3.26 | D2  Paragraph 3.2.7 A | **3.2.7A The Mayor has published a London Quality Review Charter, with accompanying guidance. The Charter promotes a consistent approach across London’s design review sector, and promotes transparency of process. The Charter builds on the established guidance (from the Design Council Commission for Architecture and the Built Environment (CABE), Landscape Institute (LI), Royal Town Planning Institute (RTPI) and the Royal Institute of British Architects (RIBA)), which calls for reviews to be independent, expert, multidisciplinary, accountable, transparent, proportionate, timely, advisory, objective and available. The Charter** ~~Mayor has produced guidance on design reviews~~**~~,~~ includes**~~ing~~ **guidance on how panels and processes should be managed and records kept. It also clarifies that the purpose of the design review process is not to dictate the design of a scheme or contradict planning policy, but to guide better design outcomes. More widely, the Mayor’s Good Growth by Design Programme, is developing a support offer to London’s boroughs and London’s review sector, for example, offering advice to boroughs wishing to put in place a design review function.** | Businesses, London  Boroughs, Agents,  Historic England | Clarification |
| MSC.3.27 | D2  Paragraph 3.2.10 | 3.2.10 It is generally beneficial to the design quality of a completed development if the architectural design team is involved in the development from start to finish24. Consideration should be given to securing the design team’s ongoing involvement as a condition of planning permission, ~~or~~ as a design reviewer**, or through an architect retention clause in a legal agreement.** ~~where this is not possible.~~ | Businesses, London Boroughs, Agents | Clarification |
| MSC.3.28 | Figure 3.2 | *Previously Figure 7.4 inserted after paragraph 3.2.10*  Figure 3.2 Outline Character Map of London |  | Clarification |
| MSC.3.29 | D3 A 1 | A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:   1. can be entered, ~~and~~ used **and exited** safely, easily and with dignity by all | The Access Association | Clarification and consistency with D11 |
| MSC.3.30 | D3 A 3 | A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:  3) are designed to incorporate safe and dignified emergency evacuation for all building users. In **all** developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a **sufficiently sized** fire evacuation lift suitable to be used to evacuate people who require level access from the building. |  | Consistency with D11 |
| MSC.3.31 | D3  Paragraph 3.3.1A | **3.3.1A It is essential to consider inclusive design at the earliest possible stage in a scheme’s development, and inclusive design should be embedded into a project from initial conception through to completion, occupation and in the on-going management and maintenance of the development. Master plans and design codes should therefore embed and document the highest standards of inclusive design, for this approach to be carried forward throughout the development of projects.** | Rachael Marshall, Habinteg, Richard Lee, Central Ealing, Residents Association | Clarification |
| MSC.3.32 | D3  Paragraph 3.3.2 | 3.3.2 …... Links to the wider neighbourhood for all pedestrians should be carefully considered, including networks of **legible, logical, safe and** navigable ~~safe~~ pedestrian routes, dropped kerbs and crossing points with associated tactile paving. | LB Islington | Clarification and Consistency |
| MSC.3.33 | D3  Paragraph 3.3.2 | 3.3.2…… pedestrian routes, dropped kerbs and crossing points with associated tactile paving. ~~Links into the neighbourhood for all pedestrians should be carefully considered, including networks of navigable safe pedestrian routes, dropped kerbs and crossing points with associated tactile paving.~~ | London Boroughs, The Access Association | Readability |
| MSC.3.34 | D3  Paragraph 3.3.5 | 3.3.5 ………. All building users should be able to evacuate from a building with dignity and by as independent means as possible. Emergency carry down or carry up **mechanical** devices **or similar interventions that rely on manual handling** are not considered to be appropriate, for reasons of user dignity and independence. | LB Hillingdon | Clarification |
| MSC.3.35 | D3  Paragraph 3.3.5 | 3.3.5 ……… The installation of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. ~~Elements of construction forming refuges, evacuation lift enclosures and lobbies should incorporate suitable levels of fire resistance~~**~~.~~ Associated with these, suitable levels of fire resistance should be achieved to the enclosures of fire evacuation lifts/ shafts, associated refuges and any lobbies. See also D11 Fire safety.** |  | Clarification and consistency with D11 |
| MSC.3.36 | D3  Paragraph 3.3.7 | 3.3.7 Inclusive design principles should be discussed with boroughs in advance of an application being submitted, to ensure that these principles are understood and incorporated into the original design concept. To demonstrate this, **and to inform decision making, speed up the process and bring about better-quality development,** an inclusive design statementis required as part of the Design and Access Statement. |  | Clarification |
| MSC.3.37 | D3  Paragraph 3.3.7 | 3.3.7……The inclusive design statement should:  **•** explain the design concept and illustrate how an inclusive design approach has been incorporated into this   * **detail what best practice standards and design guidance documents have been applied in terms of inclusive design**   • show that the potential impacts of the proposal on people and communities who share a protected characteristic have been identified and assessed   * highlight any historical contextual considerations   • set out how inclusion will be maintained and managed, including fire evacuation procedures  • ~~detail how relevant best practice standards and design guidance have been applied, and~~ **highlight** how relevant planning policy and legal requirements (including, where relevant, the Public Sector Equality Duty of the Equality Act 2010) have been responded to | Police Crime Prevention Initiatives Limited  Lift and escalator industry association | Clarification and Readability |
| MSC.3.38 | D3  Paragraph 3.3.7A | **3.3.7A The planning of inclusive design elements of development proposals and the drafting of inclusive design statements should be undertaken by or have input from a suitably qualified specialist with relevant experience in inclusive design, such as a member of the National Register of Access Consultants. Local authority access officers or inclusive design advisors should assist in the evaluation of development proposals and inclusive design statements in terms of inclusive design.** | IDaAP, NRAC, Withernay Projects, Centre for accessible environments, The Access Association, Martin McConaghy, Arup | Clarification |
| MSC.3.39 | D3  Paragraph 3.3.8 | 3.3.8 The Mayor will assist boroughs and other agencies in implementing an inclusive design approach in all development proposals by providing further guidance where necessary, continuing to contribute to the development of national technical standards and supporting training and professional development programmes. Further guidance on inclusive design standards can be found in the **following** British Standards **documents** ~~BS8300 Volumes 1 and 2.:~~   * **BS8300-1:2018 Design of an accessible and inclusive built environment. External environment. Code of practice. January 2018.** * **BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice. January 2018.** | Barnet Society, Centre for Accessible Environments | Factual Update |
| MSC.3.40 | D4 A - G | *Clauses A-G re-order and some combined* |  | Clarification and Readability |
| MSC.3.41 | D4 A and B | *Clauses A and B combined*  ~~A To optimise the development of housing on sites across London a range of housing typologies will need to be built. To bring forward development on constrained sites, innovative housing designs that meet the requirements of this policy, including minimum space standards, are supported. In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures.~~  **A** ~~B~~ **Housing development** ~~New homes~~ should **be of high quality design, and provide** ~~have~~ adequately-sized rooms **(see Table 3.1), with comfortable** and**functional** ~~convenient and efficient room~~ layouts**,** which are ~~functional,~~ fit for purpose and meet the ~~changing~~ needs of Londoners**, without differentiating between tenures.** ~~over their lifetimes. Particular account should be taken of the needs of children, disabled and older people.~~ | RB Kingston | Clarification |
| MSC.3.42 | D4 B  previously C | **B** ~~C~~ Qualitative aspects of a development are key to ensuring successful sustainable housing ~~and should be fully considered in the design of any housing developments~~. **Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.** | LB Tower Hamlets, LB Merton, RB Kensington and Chelsea, Mubin Trust for London | Clarification |
| MSC.3.43 | D4 C  previously E | **C** ~~E~~~~Residential~~ **Housing** development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 London’s form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating. | London Environment Directors’ Network, Environmental Services Association, SUEZ Recycling and Recovery UK Ltd | Clarification |
| MSC.3.44 | D4 D | ~~D~~*Moved. See below* | LB Tower Hamlets, LB Merton | Clarification |
| MSC.3.45 | D4 E | E~~Residential~~ **Housing** development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single |  | Clarification |
| MSC.3.46 | D4 G | G~~Dwellings~~ **Housing** should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food **waste as well as residual waste.** | LB Tower Hamlets, LB Merton, RB Kensington and Chelsea, Mubin Trust for London | Clarification |
| MSC.3.47 | D4 GA  Previously  D9 and D10 | ~~D~~ **GA** Housing developments are required to meet the minimum standards below~~.~~  **which** ~~These standards~~ apply to all tenures and all residential accommodation that is self-contained.  9) ~~A~~ **Where there are no higher local standards in the borough development plan documents,** a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant**, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1.** This does not count towards the minimum Gross Internal Area space standards required in Table 3.1.  ~~10) The minimum depth and width for all balconies and other private external spaces should be 1.5m.~~ | Mr Colin Bannon, The Putney Society | Clarification |
| MSC.3.48 | D4  Table 3.1 | Table 3.1 - Minimum **internal** space standards for new dwellings | LB Waltham Forrest | Clarification |
| MSC.3.49 | D4  Table 3.1  Key | Key  b: bedrooms  p: persons | Mrs Tatiana Telles Ferreria | Correction |
| MSC.3.50 | D4  Table 3.1  Key | \* Where a studio / one **single** bedroom one person ~~one bedspace (i.e. one single bedroom)~~ dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39 sqm to 37 sqm, as shown bracketed. | Mrs Tatiana Telles Ferreria | Clarification |
| MSC.3.51 | D4  Table 3.1  Key | **GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with five or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA, provided that all aspects of the space standard have been met.** | Mrs Tatiana Telles Ferreria | Clarification |
| MSC.3.52 | D4  Paragraph 3.4.2 | 3.4.2 The space standards are minimums which applicants are encouraged to exceed. ~~However, due to the level of housing need and the requirement to make the best use of land, boroughs are encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 as they do not constitute an efficient use of land.~~ The standards apply to all new self-contained dwellings of any tenure**, and consideration should be given to the elements that enable a home to become a comfortable place of retreat.** The provision of additional services and spaces as part of a housing development, such as building management and communal amenity space, is not a justification for failing to deliver these minimum standards. **Boroughs are, however, encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 for the number of bedspaces they contain due to the level of housing need and the need to make efficient use of land.** | Kesslers Stratford Limited, Blackheath Society, The Wimbledon Society, LB Bexley, LB Richmond upon Thames  LB Enfield, Canary Wharf Group, London Assembly Planning Committee , GLA Conservative Group, The Kew Society, London Forum of Amenity and Civic Societies, individuals | Clarification |
| MSC.3.53 | D4  Paragraph 3.4.3 | 3.4.3 To address the impacts of the urban heat island effect and the fact that the majority of ~~residential~~ **housing** developments in London are **made up of** flats, a minimum ceiling height of 2.5m for at least 75 per cent of the gross internal area is required so that new housing is of adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space. |  | Consistency of terminology and clarification |
| MSC.3.54 | D4  Paragraphs 3.4.5A, 3.4.5B, 3.4.5C, 3.4.5D and 3.4.5E | *Reordering of paragraphs*  **3.4.5A** ~~3.4.10~~  **3.4.5B** ~~3.4.8~~  **3.4.5C** ~~3.4.9~~  **3.4.5D** ~~3.4.6~~  **3.4.5E** *~~3.4.7~~*  ~~3.4.8~~ *Moved*  ~~3.4.9~~ *Moved*  ~~3.4.10~~ *Moved* |  | Readability |
| MSC.3.55 | D4 3.4.5C | **3.4.5C** ~~3.4.9~~ Development should help create a more socially inclusive London. Gated forms of development that could realistically be provided as a public street are unacceptable and alternative means of security should be achieved through utilising the principles of good urban design **and inclusive design (see D3 Inclusive design).** | The Access Association  Timothy Gill  Holly Jane Wier | Clarification and Consistency |
| MSC.3.56 | D4  Paragraph 3.4.5D | **3.4.5D** ~~3.4.6~~ Private ~~open~~ outside space should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity. All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of roof areas, including podiums, and courtyards for additional private or shared **outside** ~~outside or shared amenity or garden~~ space is encouraged. | London Food LInk/ Sustain | Clarification |
| MSC.3.57 | D4  Paragraph 3.4.5E | **3.4.5E** ~~3.4.7~~ Communal play space ~~for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the requirement~~ **should meet the requirements** of Policy S4 Play and informal recreation. | Chiswick Protection Society | Clarification |
| MSC.3.58 | D4  Paragraph 3.4.11 | *Paragraph 3.4.11 deleted and replace with new table 3.2*  ~~3.4.11 The following qualitative aspects should be addressed in the design of residential developments:~~  ~~• the built form, massing and height of the development is appropriate for the surrounding context, and alternative arrangements to accommodate the same number of units or bedspaces with a different relationship to the surrounding context have been explored early in the design process (making use of the measures in D6.E), particularly where a proposal is above the applicable density indicated in part C of Policy D6 Optimising housing density~~  ~~• the urban layout, including spaces between and around buildings forms a coherent pattern of streets and blocks~~  ~~• public, communal and private open spaces relate well to each other and the wider neighbourhood~~  ~~• the layout of the scheme maximises the extent of active frontages onto public facing sides and, where appropriate, surrounds uses that have inactive frontages with uses that have active frontages to engender street-based activity and provide a sense of safety~~  ~~• the experience of arrival, via footpaths, entrances and shared circulation spaces is comfortable, accessible and fit for purpose~~  ~~• communal open spaces provide sufficient space, are easily accessed from all related dwellings and are designed to support an appropriate balance of informal social activity and play opportunities for various age groups~~  ~~• the private amenity space for each dwelling is usable and has a balance of openness and protection, appropriate for its outlook and orientation~~  ~~• outdoor spaces are located to be appreciated from inside, and internal spaces are able to take advantage of good weather and designed to achieve ease of access to external spaces~~  ~~• blocks and floorplans are orientated to optimise opportunities for visual interest through a range of immediate and longer range views, with the views from individual dwellings considered at an early design stage~~  ~~• the dwellings and outside spaces are fit for purpose and comfortable~~  ~~• the dwellings and outside spaces are able to be easily adapted to meet the changing and diverse needs of different occupiers over their lifetimes~~  ~~• window cleaning and other basic cleaning and maintenance activities can be carried out by residents easily~~  ~~• the site layout, common parts, design of individual units and buildings, and orientation of rooms and windows provide privacy and adequate daylight for all residents, as well as clear and convenient routes with a feeling of safety~~  ~~• the design or the layout and orientation helps reduce noise from common areas to individual dwellings~~  ~~• the design of developments, and orientation and layout of individual dwellings and common spaces helps meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters~~  ~~• sufficient level, secure and convenient externally accessible storage is provided for cycles, deliveries, and other bulky items~~  ~~• recycling and waste disposal facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services~~~~26~~~~.~~ |  | Clarification |
| MSC.3.59 | D4  Table 3.2 | *Insert new Table 3.2 – See Appendix*  **Table 3.2 Qualitative design aspects to be addressed in housing developments** | London Boroughs, London Waste and Recycling Board, Monks Orchard Residents Association, Mubin Trust for London | Clarification |
| MSC.3.60 | D5 A 1 | A To provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that:  1) at least 10 per cent of ~~new build~~ dwellings **(which are created via works to which Part M volume 1 of the Building Regulations applies)** meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’~~, i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users~~ | Age UK London, Alzheimer’s Society, Aspire, Habinteg, Hammersmith and Fulham Disability Forum, London Boroughs, IDaAP, The Access Association, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, Retirement Lifestyles Ltd., Liam Proudlock | Clarification |
| MSC.3.61 | D5 A 2 | A To provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that:  2) all other ~~new build~~ dwellings **(which are created via works to which Part M volume 1 of the Building Regulations applies)** meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’. | Age UK London, Alzheimer’s Society, Aspire, Habinteg, Hammersmith and Fulham Disability Forum, London Boroughs, IDaAP, The Access Association |  |
| MSC.3.62 | D5  Paragraph 3.5.1  Footnote 27 and 27A | 3.5.1 Many households in London ~~already~~ require **accessible or adapted housing** to lead dignified and independent lives27. **In addition,** ~~More~~ Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving due to inaccessible accommodation. To address these and future needs, Policy D5 Accessible housing should apply to all ~~new build~~ dwellings **which** **are created via works to which Part M volume 1 of the Building Regulations applies27A, which, at the time of publication of this Plan generally limits the application of this policy to new build dwellings.**  *Delete footnote 27 and insert new footnote 27A*  ~~27~~ ~~Source English Housing Survey~~  **27A This is governed by the statutory instruments; No. 2214** **Building and Buildings, England and Wales, and The Building Regulations 2010,** [**http://www.legislation.gov.uk/uksi/2010/2214/pdfs/uksi\_20102214\_en.pdf**](http://www.legislation.gov.uk/uksi/2010/2214/pdfs/uksi_20102214_en.pdf)  **and No. 767 Building and Buildings, England and Wales The Building Regulations &c. (Amendment) Regulations 2015** [**http://www.legislation.gov.uk/uksi/2015/767/pdfs/uksi\_20150767\_en.pdf**](http://www.legislation.gov.uk/uksi/2015/767/pdfs/uksi_20150767_en.pdf)**.** | Age UK London, LB Ealing, Alzheimer’s Society, Aspire, Habinteg, Hammersmith and Fulham Disability Forum, LB Brent, LB Harringey, LB Barnet  IDaAP, The Access Association | Clarification |
| MSC.3.63 | D5  Paragraph 3.5.2 | 3.5.2 …….. to ensure that people can visit their neighbours with ease and are not limited by the design of communal areas. **For residential disabled persons parking requirements- see Policy T6.1 Residential parking.** | The Access Association | Clarification and Consistency |
| MSC.3.64 | D5  Paragraph 3.5.6 | 3.5.6 In exceptional circumstances, the provision of a lift to dwelling entrances may not be achievable. In the following circumstances and **only** in blocks of four storeys or less, it may be necessary to apply some flexibility in the application of this policy:  **•** Specific small-scale infill developments (see Policy H2 Small sites)  **•** Flats above existing shops or garages ~~stacked maisonettes where the potential for decked access to the lift is restricted~~   * **Stacked maisonettes where the potential for decked access to lifts is restricted**   **~~•~~** ~~Blocks where the implications of ongoing maintenance costs on the affordability of service charges for residents will be prohibitive.~~ | Just Space, IDaAP,  Centre for Accessible Environments, The Access Association,  Trust for London, Levitt Bernstein | Clarification |
| MSC.3.65 | D5  Paragraph 3.5.8 | 3.5.8 …….Planning conditions should specify:  **•** Number of dwellings per size typology (i.e. x no. of y bed units) which ~~required to meet M4(2)~~ **must comply with Part M4(2)**  **•** Number of dwellings per size typology (i.e. x no. of y bed units) which ~~are required to meet M4(3) wheelchair accessible standards~~ **must comply with Part M4(3)(2)(a) wheelchair adaptable standards.**  **•** Number of dwellings per size typology (i.e. x no. of y bed units) which ~~are required to meet M4(3) wheelchair adaptable standards~~ **must comply with Part M4(3)(2) wheelchair accessible standards.** | LB Camden, Hammersmith and Fulham Disability Forum | Clarification |
| MSC.3.66 | D6 Title | Policy D6 Optimising ~~housing~~ density | Levitt Bernstein, The British Library | Clarification |
| MSC.3.67 | D6 A | A Development ~~proposals~~ must make the most efficient use of land and be ~~developed~~ **designed** at the optimum density. The ~~optimum density~~**processes required by parts A and B** of ~~a development should result from~~**Policy D2 Delivering good design set out how** a design-led approach ~~to determine~~ **will inform** the **evaluation of a** **site’s context and help to identify its** capacity ~~of the site.~~**for growth.** Particular consideration should be given **to the following evaluation criteria to determine optimal development density:** | Levitt Bernstein | Clarification |
| MSC.3.68 | D6 A 1 | A …………Particular consideration should be given to the following evaluation criteria to determine optimal development density:   1. the site context, **including surrounding built form, uses and character;** | Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond  Idividuals | Clarification |
| MSC.3.69 | D6 A 2  New footnote 28A | A …………Particular consideration should be given to the following evaluation criteria to determine optimal development density:   1. ~~its~~**the site’s** connectivity and accessibility by walking**,** ~~and~~ cycling, and existing and planned public transport **to jobs and services** (including **both** PTAL **and access to local services28A**)**;**   *Insert new footnote 28A*  **28A Time Mapping (TIM) catchment analysis is available on TfL’s WebCAT webpage and provides data showing access to employment, town centres, health services, and educational establishments as well as displaying the population catchment for a given point in London (see PTAL in glossary for more information on WebCAT and Time Mapping).** | HTA Design | Clarification |
| MSC.3.70 | D6 A 3 | A ..…Particular consideration should be given to the following evaluation criteria to determine optimal development density:  3) the capacity of surrounding infrastructure **(see Part B)** | Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd | Clarification |
| MSC.3.71 | D6 A (end paragraph | *Moved to new clause EA*  A …………Particular consideration should be given to the following evaluation criteria to determine optimal development density:  ~~Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.~~ | Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond  Individuals | Clarification |
| MSC.3.72 | D6 B | B **In preparing Development Plans and area based strategies, boroughs should follow the approach set out in part A to determine the capacity of allocated sites.** The capacity of existing and planned physical, environmental and social infrastructure to support new development **proposed by Development Plans** should be assessed and, where necessary, improvements to infrastructure capacity should be planned **in infrastructure delivery plans or programmes** to support growth. | Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd | Clarification |
| MSC.3.73 | D6 B 2 | B …..and, where necessary, improvements to infrastructure capacity should be planned **in infrastructure delivery plans or programmes** to support growth.  2) The ability to support ~~proposed~~ **higher** densities through encouraging **increased levels of** active travel should be taken into account. | Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd | Clarification |
| MSC.3.74 | D6 B 3 | B …..and, where necessary, improvements to infrastructure capacity should be planned **in infrastructure delivery plans or programmes** to support growth.  3) Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, ~~in exceptional~~~~circumstances,~~ that **if the** development is contingent on the provision of ~~the~~~~necessary~~**new** infrastructure**,** ~~and~~ **including** public transport services**,** ~~and~~ **it will be appropriate** that the development is phased accordingly. | Alona Sherman, Liam Kelly, Claire Mellish, Paul McQuillen, Paul Stansfield, Robert Gurd, Simon Saville, The Hammersmith Society, Just Space, CPRE, Hornsey & Wood Green Labour Party, GLA Green Party Group | Clarification |
| MSC.3.75 | D6 B 3A | B …..and, where necessary, improvements to infrastructure capacity should be planned **in infrastructure delivery plans or programmes** to support growth.  **3A) When a proposed development exceeds the capacity identified in a local site allocation or the site is not allocated, and the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and CIL contribution that the development will make.** | Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd | Clarification |
| MSC.3.76 | Policy D6 C | C The higher the density of a development, the greater the level of scrutiny that is required of its design. **For residential development it is** particularly **important to scrutinise** the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and ~~the~~ **its** proposed ongoing management. Development proposals ~~with a residential component~~ that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design and **those with a residential component must** submit a management plan if the proposed density is above: | Levitt Bernstein, The British Library | Clarification |
| MSC.3.77 | D6 D | D The following measure**ment**s of density should be provided for all planning applications that include new residential units: |  | Readability |
| MSC.3.78 | D6 E | E The following additional measure**ment**s should be provided for all major planning applications: |  |  |
| MSC.3.79 | D6 E  (end of Policy) | E …should be provided for all major planning applications: …  ~~These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.~~ | Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond  Individuals | Clarification and consistency with A 1 |
| MSC.3.80 | D6 EA | **EA Proposed development that does not demonstrably optimise the density of the site in accordance with this policy should be refused.** |  | Readability |
| MSC.3.81 | D6  Paragraph 3.6.1 | 3.6.1 For London to accommodate **the** growth **identified in this Plan** in an inclusive and responsible way every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites. The design of the development must **optimise** ~~housing~~ **density.** | Levitt Bernstein, The British Library | Clarification |
| MSC.3.82 | D6  Paragraph 3.6.1A | **3.6.1A** A design-led approach to optimising density should be based on an evaluation of the site’s attributes, its surrounding context and **its** capacity for growth ~~and the most appropriate development form, which are determined by following the process set out in Policy D2 Delivering good design. Policy H1 Increasing housing supply, Policy H2 Small sites and Policy H3 Monitoring housing targets set out requirements for increasing housing supply across London and identify locations where increased housing capacity can be achieved~~. **Policy D1 London’s form and characteristic and Policy D2 Delivering good design support the application of the design-led approach to optimising density. Policy D1 sets out design principles and physical characteristics that new development should deliver. Policy D2 parts A and B require the evaluation of the current characteristics of an area, including its infrastructure, and using this evaluation of evidence to establish what the most appropriate form of development is for an area in terms of scale, height, density, layout and land use, to create places which meet the requirements of Policy D1. The Mayor will provide further guidance on assessing site capacity and optimising density through a design led approach.** | Friends of the Earth, Gravesham Borough Council, LB Hillingdon, LB Richmond  Inividuals | Clarification |
| MSC.3.83 | D6  Paragraph 3.6.2 | 3.6.2 **Infrastructure** ~~assessments~~ **provision** should be proportionate to the scale of ~~the~~ development. **The locations and scale of growth will be identified through boroughs’ Development Plans, particularly through site allocations. Infrastructure capacity, having regard to the growth identified in the Development Plan, should be identified in boroughs’ infrastructure delivery plans or programmes.** | Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield), Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd | Clarification |
| MSC.3.84 | D6  Paragraph 3.6.2A | **3.6.2A If developments come forward with capacities in excess of those allocated in the relevant Development Plan, and therefore in excess of future planned infrastructure, a site-specific infrastructure assessment will be required. This assessment should establish what additional impact the proposed development will have on current and planned infrastructure, and how this can be appropriately mitigated either on the site, or through an off-site mechanism, having regard to the amount of CIL generated.** | Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, & multiple developers (Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd | Clarification |
| MSC.3.85 | D6  Paragraph 3.6.3 | 3.6.3 ~~The surrounding infrastructure of all types is a key element in determining the optimum density of a site~~. The **capacity of existing and future public transport services**, and the connections they provide, should be taken into consideration…………. | Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd | Clarification and consistency. |
| MSC.3.86 | D6  Paragraph 3.6.3A | **3.6.3A** ~~3.6.2~~ Minor developments will typically have incremental impacts on local infrastructure capacity~~,~~**.** **The cumulative demands on infrastructure of minor development** which should be addressed in boroughs ~~I~~**i**nfrastructure ~~D~~**d**elivery **P**~~p~~lans **or programme.** | Kingston & Surbiton Constituency Labour Party, London Councils, LB Wandsworth, LB Enfield, Get Living London, Home Builders Federation, Argent, One Housing Group, Kesslers Stratford Ltd, Canary Wharf Group, Berkeley Group, Dagenham Dock Ltd | Clarification |
| MSC.3.87 | D6  Paragraph 3.6.4 | 3.6.4 ……. In many areas of London higher densities could be supported by maximising the potential of active travel. Those ~~exceptional~~ **limited** circumstances for which part B3 of the policy could apply include development being brought forward in areas where planned public transport schemes will significantly improve accessibility and capacity of an area, such as Crossrail 2, DLR extensions, extension of the Elizabeth Line, and the Bakerloo Line Extension | Alona Sherman, Liam Kelly, Claire Mellish, Paul McQuillen, Paul Stansfield, Robert Gurd, Simon Saville,The Hammersmith Society, Just Space, CPRE, Hornsey & Wood Green Labour Party, GLA Green Party Group | Clarification |
| MSC.3.88 | D6  Paragraph 3.6.7 | 3.6.7 The proposed design and management of the developments should be thoroughly scrutinised during the planning process**. Residential portions should be scrutinised** in line with part C of Policy D6 Optimising ~~housing~~ density. The higher the density of a development the greater this scrutiny should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. This is important because these elements of the development come under more pressure as the density increases.The housing minimum space standards set out in Policy D4 Housing quality and standards help ensure that as densities increase, ~~the~~ quality of internal residential units is maintained. | Levitt Bernstein, The British Library | Clarification |
| MSC.3.89 | D6  Paragraph 3.6.8 | 3.6.8 **To ensure servicing and day to day management of residential developments have been considered in designing** **higher density development the** ~~M~~**management plans** required to be submitted with higher density development proposal **by part C of this policy**, must include details of day-to-day servicing and deliveries, and longer-term maintenance implications. | The Highbury Group | For clarity. |
| MSC.3.90 | D6  Paragraph 3.6.10 | 3.6.10 ….. Density measures related to the residential population (part D of Policy D6 Optimising ~~housing~~ density) will be relevant for infrastructure provision, while measures of density related to the built form and massing (part E of Policy D6 Optimising ~~housing~~ density) will inform its integration with the surrounding context. | Levitt Bernstein, The British Library | Consistency |
| MSC.3.91 | D7 A - M | Development Plans and development proposals should:  A ~~E~~**e**nsure the public realm is …..  B ~~M~~**m**aximise the contribution that…..  C ~~B~~**b**e based on an understanding of…  D ~~E~~**e**nsure both the movement…..  E ~~E~~**e**nsure there is a mutually ……  F ~~E~~**e**nsure buildings are of …….  G ~~E~~**e**nsure appropriate …….  H ~~I~~**i**ncorporate green ……..  I ~~E~~**e**nsure that **appropriate** shade….  J ~~E~~**e**xplore opportunities for.……  K ~~C~~**c**reate an engaging public…..  L ~~E~~**e**nsure that **any** on-street………  M ~~E~~**e**nsure the provision and ……… |  | Consistency |
| MSC.3.92 | D7 A | A ~~E~~**e**nsure the public realm is **well-designed,** safe, accessible, inclusive, attractive, well-connected, **related to the local and historic context, and** easy to understand**, service** and maintain**. Landscape treatment**, ~~and that it relates to the local and historic context, and incorporates the highest quality design, landscaping,~~ planting, street furniture and surface~~s~~ **materials should be of good quality, fit-for-purpose, durable and sustainable**. | London Boroughs, Businesses, Agents | Clarification and Readability |
| MSC.3.93 | D7 C | C ……. In particular, they should demonstrate an understanding **of how people use the public realm, and** the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists. | London Assembly Planning Committee | Clarification |
| MSC.3.94 | D7 D | D ……….. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings**, which should be regular, convenient and accessible**. | London Boroughs, Businesses, Campaign Group | Clarification |
| MSC.3.95 | D7 H | H ~~I~~**i**ncorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, **moderate surface and air temperature** ~~manage heat~~ and increase biodiversity. | RB Kingston | Clarification |
| MSC.3.96 | D7 I | I ~~E~~**e**nsure that **appropriate** shade**,** ~~and~~ shelter **and seating** are provided ~~with appropriate types and amounts of seating~~ to encourage people to spend time in a place**.**~~, where appropriate.~~ This should be done in conjunction with the removal of ~~any unnecessary or dysfunctional~~ clutter**, including** ~~or~~ street furniture **that is poorly located, unsightly, in poor condition or without a clear function,** to ensure **that** ~~the function of the space and~~ pedestrian amenity is improved. **Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space.** Applications which seek to introduce unnecessary street furniture should ~~normally~~ be refused. | London Boroughs, Businesses  Agents, Professional Body | Clarification |
| MSC.3.97 | D7  J | J ~~E~~**e**xplore opportunities for innovative approaches to improving the public realm such as open street events **and Play Streets**. | Individuals | Clarification |
| MSC.3.98 | D7 K | K ~~C~~**c**reate an engaging public realm for people of all ages, with opportunities for **social activities,** formal and informal play and social **interaction** ~~activities~~ during the daytime, evening and at night. | LB Islington | Clarification |
| MSC.3.99 | D7 L | L ~~E~~**e**nsure that **any** on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. **Parking should not obstruct pedestrian lines.** ~~Pedestrian crossings should be regular, convenient and accessible.~~ | London Boroughs, Businesses | Clarification |
| MSC.3.100 | D7 M | M ~~E~~**e**nsure the provision and future management of free drinking water at appropriate locations in **the** ~~new or redeveloped~~ public realm**, including where new public realm is provided**. | London Forum of Amenity and Civic Societies | Clarification |
| MSC.3.101 | D7  Paragraph 3.7.1 | 3.7.1 The public realm includes all the publicly-accessible space… |  | Correction |
| MSC.3.102 | D7  Paragraph 3.7.1 | 3.7.1..… Some internal or elevated spaces can also be considered as part of the public realm, such as **markets,** shopping malls, sky gardens, viewing platforms, museums or station concourses… | London Forum of Amenity and Civic Societies | Clarification |
| MSC.3.103 | D7  Paragraph  3.7.2 | 3.7.2…For this reason, the public realm, and the buildings that frame those spaces, should be **designed for people**, ~~multi-functional,~~ attractive, accessible and contribute to the highest possible standards of comfort, good acoustic design, security and ease of movement. | Levitt Bernstein | Clarification |
| MSC.3.104 | D7  Paragraph  3.7.3 | 3.7.3…The remaining streets are places which function as key centres for leisure, shopping, **culture, social interaction** and accessing services and employment, such as high streets or public squares. |  | Clarification |
| MSC.3.105 | D7 Paragraph 3.7.4 | 3.7.4 The specific balance between the different functions of any one space, such as its place-based activities**,** ~~and~~ its function to facilitate movement **and its ability to accommodate different uses of the kerbside**, should be at the heart of how the space is designed and managed… | Centre for London | Clarification |
| MSC.3.106 | D7 Paragraph  3.7.6 | 3.7.6 …The opportunity to incorporate these uses should be identified and facilitated through **community engagement,** careful design and good acoustic design. |  | Clarification |
| MSC.3.107 | D7 Paragraph 3.7.11 | 3.7.11 The provision of **accessible** free drinking waterfountains helps improve public health, reduces waste from single-use plastic bottles and supports the circular economy through the use of reusable water bottles… |  | Clarification |
| MSC.3.108 | D8  Introduction | ~~Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:~~ | Individuals, Historic England, London Assembly Planning Committee | Clarification and Consistency within Plan |
| MSC.3.109 | D8 A | **Definition**  A Based on local context, Development Plans should define what is considered a tall building **for specific localities**, the height of which **will** ~~may~~ vary **between and with**in different parts of London. |  | Clarification |
| MSC.3.110 | D8 B | ~~Tall building l~~Locations  B Tall buildings should **only** be **developed in sustainable locations that are identified in Development Plans**~~part of a plan-led approach to changing or developing an area~~. **By following the processes required in parts A, B and C of Policy D2 Delivering good design** **b**~~B~~oroughs should **determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. Boroughs should** identify **any such locations** on maps in Development Plans ~~the locations where tall buildings will be an appropriate form of development in principle,~~ and should indicate the general building heights that would be appropriate **in these locations**, taking account of: | London Boroughs, Businesses, Historic England, London Assembly Planning Committee | Clarification |
| MSC.3.111 | D8 B | *Insert new paragraph under D8 B 3)*  B Tall buildings should only be developed in sustainable locations that are identified in Development Plans……..  3) the public transport connectivity of different locations.  **This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.** | LB Islington, Historic England | Clarification |
| MSC.3.112 | D8 C 1 - 4 | C The impacts of a tall building can be visual, functional or environmental…….  1) ~~V~~**v**isual impacts  a) ~~T~~**t**he views of ……  i ~~L~~**l**ong-range views ……  ii ~~M~~**m**id-range views ……  iii ~~I~~**i**mmediate views…….  b) ~~W~~**w**hether part of a ……..  c) ~~A~~**a**rchitectural quality …..  d) ~~P~~**p**roposals should take …..  e) ~~B~~**b**uildings in the …….  f) ~~B~~**b**uildings near the River…..  g) ~~B~~**b**uildings should not ……  2 ) ~~F~~**f**unctional impact  a) ~~T~~**t**he internal and ……  b) ~~B~~**b**uildings should ……  c) ~~E~~**e**ntrances, access routes, ……  d) ~~I~~**i**t must be demonstrated ……  e) ~~I~~**i**nfrastructure improvements  f) ~~J~~**j**obs, services, ……  g) ~~B~~**b**uildings, including …..  3) ~~E~~**e**nvironmental impact  a) ~~W~~**w**ind, daylight, sunlight….  b) ~~A~~**a**ir movement affected......  c) ~~N~~**n**oise created by air…….  4) ~~C~~**c**umulative impacts  a) ~~T~~**t**he cumulative visual…….. |  | Correction |
| MSC.3.113 | D8 C | **Impacts**  C The impacts of a tall building can be visual, functional or environmental. All **the following impacts** ~~three elements~~ should be ~~considered~~ **addressed** within plan-making and in ~~deciding~~ development proposals: | Historic Royal Palaces,  London Assembly Planning Committee | Clarification |
| MSC.3.114 | D8 C 1 a) | **Impacts**  C ……..should be ~~considered~~ **addressed** within plan-making and in ~~deciding~~ development proposals:  1) ~~V~~**v**isual impacts  a) ~~T~~**t**he views of buildings from different distances: ~~need to be considered, including~~ |  |  |
| MSC.3.115 | D8 C 1 e | **Impacts**  C ……..should be ~~considered~~ **addressed** within plan-making and in ~~deciding~~ development proposals:  1) ~~V~~**v**isual impacts  e) Buildings in the setting of a World Heritage Site must preserve**,** **and not harm,** the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it | Historic Royal Palaces,  Historic England | Clarification |
| MSC.3.116 | D8 C 1 f | **Impacts**  C ……..should be ~~considered~~ **addressed** within plan-making and in ~~deciding~~ development proposals:  1) ~~V~~**v**isual impacts  f) Buildings near the River Thames, particularly in the Thames Policy Area, should **protect and enhance the open quality of the river and the riverside public realm, including views, and** not contribute to a canyon effect along the river ~~which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river~~ | Historic England, London Assembly Planning Committee | Clarification |
| MSC.3.117 | D8 C 2 e | C ……..should be ~~considered~~ **addressed** within plan-making and in ~~deciding~~ development proposals:  2) ~~F~~**f**unctional impact  e) ~~I~~**i**nfrastructure improvements required as a result of the development should be delivered and phased appropriately **(see also Policy D6 Optimising density)** | The Putney Society | Clarification |
| MSC.3.118 | D8 D | D **Free to enter** ~~P~~**p**ublicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where **they should normally be located at the top of the building to afford wider views across London.** | City of London Corporation | Clarification |
| MSC.3.119 | D8  Paragraph 3.8.1 | 3.8.1 Whilst high density does not need to imply high rise, tall buildings can form part of a ~~strategic~~ **plan-led** approach to **facilitating regeneration opportunities and** ~~meeting~~ **managing future growth,** ~~regeneration and economic development goals,~~ particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. | London Boroughs | Clarification |
| MSC.3.120 | D8  Paragraph 3.8.1 | 3.8.1 ……Tall buildings that are of exemplary architectural quality**, in the right place,** can make a positive contribution to London’s cityscape, and many tall buildings have become a valued part of London’s identity. impacts if in inappropriate locations and/or of poor quality design. The processes set out in Policy D2 Delivering good design will enable boroughs to identify **locations**~~areas~~ where tall buildings can play a positive role in shaping the character of an area. | London Boroughs | Clarification |
| MSC.3.121 | D8  Paragraph 3.8.2 | 3.8.2 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. **Boroughs should define what is a ‘tall building’ for specific localities.** In large areas of extensive change, such as Opportunity Areas, **the threshold for what constitutes a** ~~definitions of~~ tall building~~s~~ should relate to the evolving **(not just the existing)** context. **This policy applies to tall buildings as defined by the borough. Where there is no local definition, the policy applies to buildings over 25m in height in the Thames Policy Area, and over 30m in height elsewhere in London.** ~~For the purpose of assessing applications referable to the Mayor, a tall building is a development that meets one or more of the following descriptions:~~  **•** ~~Located within the Thames Policy Area and over 25m in height; or it falls within the Thames Policy Area and is more than 25m in height~~  ~~• Located anywhere it falls anywhere else within the City of London and is more than 150m in height~~  ~~• Located elsewhere in London and over it is more than 30m in height. elsewhere in London.~~ | Individuals, Businesses,  London Boroughs | Clarification |
| MSC.3.122 | D8 3.8.2A | **3**.**8.2A The higher the building the greater the level of scrutiny that is required of its design. In addition, tall buildings that are referable to the Mayor, must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design.** | London Boroughs, Businesses, Historic England | Clarification |
| MSC.3.123 | D8  Paragraph 3.8.7 | 3.8.7 Any external lighting for tall buildings should be energy efficient, and designed to minimise glare, light trespass, and sky glow, and ensure it does not negatively impact on **protected views** **or** the amenity of nearby residents. | London Forum of Amenity Society, Individuals | Clarification |
| MSC.3.124 | D9 A | A Boroughs~~, particularly in inner London,~~ should establish policies to address the negative impacts of large-scale basement development beneath existing buildings. | Community Groups | Clarification |
| MSC.3.125 | D9  Paragraphs 3.9.2 and 3.9.3 | *3.9.2 moved to end of section*  *3.9.3 moved to end of section* |  | Readability |
| MSC.3.126 | D9  Paragraph 3.9.4 | 3.9.4 The construction of basements can~~, however,~~ cause significant disturbance and disruption if not managed effectively, especially where there are cumulative impacts from a concentration of subterranean developments…. |  | Clarification |
| MSC.3.127 | D9  Paragraph 3.9.5 | 3.9.5 The Mayor supports boroughs in **restricting large-scale basement excavations** under existing properties where this type of development is likely to cause unacceptable harm. Local authorities are advised to consider the following issues**, including any cumulative impacts,** alongside other relevant local circumstances when developing their own policies for basement developments: | LB Islington | Clarification |
| MSC.3.128 | D9  Paragraph 3.9.5A | **3.9.5A**~~3.9.2~~ Most proposals for the construction of a basement will require planning permission. These proposals need to be managed sensitively through the planning application process to ensure that their potential impact on the local environment and residential amenity is acceptable. ~~Where basement developments cause particular harm, boroughs can consider introducing Article 4 Directions to require smaller-scale proposals to obtain planning permission.~~ | Community Groups | Clarification |
| MSC.3.129 | D9  Paragraph 3.9.5B | **3.9.5B** ~~3.9.3~~ The Mayor considers that smaller-scale basement excavations, where they are appropriately designed and constructed, can contribute to the efficient use of land~~.~~**, and** ~~They can~~ provide ~~an affordable option for families to provide~~ extra living space without the costs of moving house**.**~~, although these developments rarely result in the provision of additional residential units to help meet London’s housing need.~~ **In areas w**~~W~~here basement developments **could** cause particular harm, boroughs can consider introducing Article 4 Directions to require smaller-scale proposals to obtain planning permission. | LB Hammersmith and Fulham, Levitt Bernstein | Clarification |
| MSC.3.130 | D10 A | A Boroughs should work with their local Metropolitan Police Service ‘Design Out Crime’ officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment **and reduce the fear of crime**. | Metropolitan Police Service | Clarification |
| MSC.3.131 | D10  Paragraph 3.10.2 | 3.10.2 New developments, including building refurbishments, should be constructed with resilience at the heart of their design. In particular they should incorporate appropriate fire safety solutions and represent best practice in fire safety planning in both design and management. The ~~London Fire and Emergency Planning Authority (LFEPA)~~ **London Fire Commissioner** should be consulted early in the design process to ensure major developments have fire safety solutions built-in. Flooding issues and designing out the effects of flooding are addressed in Chapter 9. |  | Update |
| MSC.3.132 | D10  Paragraph 3.10.3  New footnote 30A | 3.10.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process**, taking into account the principles contained in guidance such as the Secured by Design Scheme30A published by the Police. Further guidance is provided by Government on security design**31. This will ensure **development proposals** ~~they~~ provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.  *Insert new footnote 30A*  **For further details see http://www.securedbydesign.com** | Metropolitan Police Service | Clarification |
| MSC.3.133 | D10  Paragraph 3.10.4 | 3.10.4 **By drawing upon current Counter Terrorism principles,** ~~N~~**n**ew development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of **their detection** ~~detecting intrusion~~, and delay**/disrupt their activity until an appropriate response can be deployed**~~any attempts at disruption until a response can be activated~~. Consideration should be given to physical, personnel and electronic security (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which **mitigate** ~~respond to~~ the potential level of risk whilst ensuring the quality of places is maximised. | Metropolitan Police Service | Clarification |
| MSC.3.134 | D11 A 1A | A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:  **1A) identify suitably positioned unobstructed outside space:**  **a) for fire appliances to be positioned on**  **b) appropriate for use as an evacuation assembly point** | London Fire and Emergency Planning Authority | Clarification |
| MSC.3.135 | D11 A 1 | A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:  1) are designed to incorporate appropriate features which reduce the risk to life **and of serious injury** in the event of a fire**; including appropriate fire alarm systems, passive and active fire safety measures** | Peter Eversden | Clarification |
| MSC.3.136 | D11 A 3 | A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:  3) provide suitable and convenient means of escape**, and associated evacuation strategy** for all building users |  |  |
| MSC.3.137 | Policy D11 A 5) (previously 4) | A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:  4)~~adopt~~ **develop** a robust strategy for evacuation which **can be periodically updated and published, and which** all building users can have confidence in | Peter Eversden  Green Party Group  London Forum of Amenity and Civic Societies | Clarification |
| MSC.3.138 | D11 B 1 | B …….. The statement should detail how the development proposal will function in terms of:   1. the building’s construction: methods, products and materials used**, including manufacturers details** | Peter Eversden  Christopher Barlow | Clarification |
| MSC.3.139 | D11 B 2 | B …….. The statement should detail how the development proposal will function in terms of:   1. the means of escape for all building users: **suitably designed** stair cores, escape for building users who are disabled or require level access, ~~and the associated management plan approach~~ **and associated evacuation strategy approach** | Peter Eversden | Clarification |
| MSC.3.140 | D11 B 2A | B …….. The statement should detail how the development proposal will function in terms of:  **2A) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans** | Peter Eversden | Clarification and consistency with B 2 |
| MSC.3.141 | D11 B 4 | B …….. The statement should detail how the development proposal will function in terms of:  4) how provision will be made within the **curtilage of the** site to enable fire appliances to gain access to the building | London Fire and Emergency Planning Authority | Clarification |
| MSC.3.142 | D11 B 4A | B …….. The statement should detail how the development proposal will function in terms of:  **4A) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.** | London Forum of Amenity and Civic Societies, Green Party Group, Peter Eversden | Clarification |
| MSC.3.143 | D11  Paragraph 3.11.2 | 3.11.2 The ~~subject~~ **matter of** fire safety **compliance** is covered by Part B of the Building Regulations. However to ensure that development proposals achieve the **highest standards of fire safety**, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole. ~~Developments, their floor layouts and cores need to be planned around issues of fire safety and a robust strategy for evacuation from the outset, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result is less successful schemes which fail to achieve the highest standards of fire safety.~~ | Gary Ferrand | Clarification |
| MSC.3.144 | D11  Paragraph 3.11.2A | **3.11.2A Applicants should demonstrate on a site plan that space has been identified for the appropriate positioning of fire appliances. These spaces should be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future.** | London Fire and Emergency Planning Authority, Boroughs, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, DP9, L&Q, Redrow Homes London Division, Barrat Developments Plc, London Property Alliance, Silvertown Homes, Royal London, Ilderton Road LLP, CIAT  London Councils, RICS, RTPI, HBF, Butler & Young Approved Inspectors Limited | Clarification |
| MSC.3.145 | D11  Paragraph  3.11.2B | **3.11.2B Applicants should also show on a site plan appropriate evacuation assembly points. These spaces should be positioned to ensure the safety of people using them in an evacuation situation.** | London Fire and Emergency Planning Authority, Boroughs, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, DP9, L&Q, Redrow Homes London Division, Barrat Developments Plc, London Property Alliance, Silvertown Homes, Royal London, Ilderton Road LLP, CIAT, London Councils  RICS, RTPI, HBF, Butler & Young Approved Inspectors Limited | Clarification |
| MSC.3.146 | D11  Paragraph 3.11.2C | **3.11.2C Developments, their floor layouts and cores need to be planned around issues of fire safety and a robust strategy for evacuation from the outset, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety. This is of particular importance in blocks of flats, as building users and residents may be less familiar with evacuation procedures.** | London Fire and Emergency Planning Authority, Boroughs, Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living, DP9, L&Q, Redrow Homes London Division, Barrat Developments Plc, London Property Alliance, Silvertown Homes, Royal London, Ilderton Road LLP, CIAT, London Councils, RICS, RTPI, HBF, Butler & Young Approved Inspectors Limited | Clarification |
| MSC.3.147 | D11 Paragraph 3.11.3A | **3.11.3A The provision of stair cores which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation should also be explored at an early stage and provided wherever possible.** | Gary Ferrand, Clarion Housing Group, LB Harrow | Clarification |
| MSC.3.148 | D11  Paragraph 3.11.4 | 3.11.4 Policy D3 Inclusive design requires development to incorporate safe and dignified emergency evacuation for all building users, by as independent means as possible. ~~Where~~ **In all developments where** lifts are installed, Policy D3 Inclusive design requires **as** a minimum ~~of~~ **at least** one lift per core **(or more subject to capacity assessments)** to be a **suitably sized** fire evacuation lift **suitable to be used to evacuate people who require level access from the building.** ~~, which incorporate suitable levels of fire resistance to elements of construction forming refuges, evacuation lift enclosures, and lobbies.~~ **Fire evacuation lifts and associated provisions should be appropriately designed, constructed and should include the necessary controls suitable for the purposes intended.** | The Access Association | Consistency with wording of D3 |
| MSC.3.149 | D11  Paragraph 3.11.5 | 3.11.5 Fire statements should be submitted with all major development proposals. These should be produced by a third-party independent suitably-qualified assessor. This should be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers **or suitably qualified and competent with the demonstrable experience to address the complexity of the design being proposed / built, which should be evidenced in the fire statement.** Planning departments ~~should~~ **could** work with and be assisted by suitably qualified and experienced officers within borough building control departments and/or the London Fire Brigade, in the evaluation of these statements. | LB Greenwich, LB Hackney, The Access Association, Christopher Barlow | Clarification |
| MSC.3.150 | D11  Paragraph 3.11.5A | **3.11.5A Security measures should not adversely impact on the means of escape nor prevent entry of the fire and rescue service.** | Metropolitan police service | Clarification |
| MSC.3.151 | D12 A | A The Agent of Change principle places the responsibility for mitigating impacts from existing noise **and other nuisance**-generating activities or uses on the proposed new noise-sensitive development. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water | Clarification |
| MSC.3.152 | D12 B | B Boroughs should ensure that development Boroughs should ensure that **Development Plans and** planning decisions reflect the Agent of Change……. | Home Builders Federation | Clarification |
| MSC.3.153 | D12 B | B …….. principle and take account of existing noise **and other nuisance**-generating uses in a sensitive manner when new development~~, particularly residential,~~ is proposed nearby. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water | Clarification |
| MSC.3.154 | D12 C | *C moved* |  | Readability |
| MSC.3.155 | D12 D | D Development should be designed to ensure that established noise **and** **other nuisance**-generating ~~venues~~ **uses** remain viable and can continue or grow without unreasonable restrictions being placed on them. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water | Clarification |
| MSC.3.156 | D12 E | E New noise **and other nuisance**-generating development~~, such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues~~ proposed close to residential and other noise-sensitive ~~development~~ **uses** should put in place measures ~~such as soundproofing~~ to mitigate and manage any noise impacts for neighbouring residents and businesses. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water | Clarification |
| MSC.3.157 | D12 EA 1  (previously C1 | *Previous Part C 1*  ~~C~~ **EA** Development proposals should manage noise and other potential nuisances by:  1) ensuring good ~~acoustic~~ design ~~to~~ mitigate**s** and minimise**s** existing and potential **nuisances** ~~impacts~~ ~~of noise~~ generated by existing uses **and activities** located in the area | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water | Clarification |
| MSC.3.158 | D12 EA 2 | *Previous Part C 2*  ~~C~~ **EA** Development proposals should manage noise and other potential nuisances by:  2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions **including ongoing and future management of mitigation measures** secured through planning obligations. | Freight and Transport Association, Tarmac, Cemtex UK, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water | Clarification |
| MSC.3.159 | D12 EA 3 | *Previous Part C 3*  ~~C~~ **EA** Development proposals should manage noise and other potential nuisances by:  3) separating new noise-sensitive development where possible from existing noise-generating businesses **and uses** through distance, screening, internal layout, sound-proofing, ~~and~~ insulation and other acoustic design measures. | London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee | Clarification |
| MSC.3.160 | D12 F | F Boroughs should refuse development proposals that have not clearly demonstrated how noise **and other nuisances** will be mitigated and managed. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water | Clarification |
| MSC.3.161 | D12  Paragraph 3.12.1 | 3.12.1 For a long time, the responsibility for managing and mitigating the impact of noise and other nuisances on neighbouring residents and businesses has been placed on the business or activity making the noise **or other nuisance**, regardless of how long the ~~noise-generating~~ business or activity has been operating in the area. In many cases, this has led to newly-arrived residents complaining about noise **and other** **nuisances** from existing businesses **or activities**, sometimes forcing the businesses **or other activities** to close ~~down~~. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water | Clarification |
| MSC.3.162 | D12  Paragraph 3.12.2 | 3.12.2 The Agent of Change principle places the responsibility for mitigating the impact of noise **and other nuisances** firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, **for example,** applicants will need to design them in a more sensitive way to protect the new occupiers, such as new residents, businesses, schools and religious institutions, from noise **and other** impacts. This could include paying for soundproofing for the existing ~~noise-generating~~ use~~s~~, such as a~~n existing~~ music venue. The Agent of Change principle works both ways. **For example,** ~~I~~**i**f a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, London Boroughs, London Assembly Planning Committee, Thames Water | Clarification |
| MSC.3.163 | D12  Paragraph 3.12.3  Footnote 32 | 3.12.3 The Agent of Change principle is included in the National Planning Policy Framework ~~at paragraph 123~~ and Planning Practice Guidance provides further information on how to mitigate the adverse impacts of noise **and other impacts such as air and light pollution32.**  *Amend footnote 32*  **32** NPPG, [~~https://www.gov.uk/guidance/noise--2#contents~~](https://www.gov.uk/guidance/noise--2#contents)**https://www.gov.uk/topic/planning-development/planning-officer-guidance** |  | Update |
| MSC.3.164 | D12  Paragraph 3.12.4 | 3.12.4 Noise-generating **cultural venues** such as theatres, concert halls, pubs, **night-clubs** and ~~live music~~ **other** venues **that host live or electronic music** should be protected (see Policy HC5 Supporting London’s culture and creative industries). | Association of Licensed Multiple Retailers, Individuals | Clarification |
| MSC.3.165 | D12 Paragraph 3.12.4A | **3.12.4A As well as cultural venues, the Agent of Change principle should be applied to all noise-generating uses and activities including schools, places of worship, sporting venues, offices, shops, industrial sites, waste sites, safeguarded wharves, rail and other transport infrastructure**. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, Thames Water Aggregates industry, London City Airport, Port of London Authority, LB Hounslow | Clarification |
| MSC.3.166 | D12  Paragraph 3.12.5 | 3.12.5 Housing and **other noise-sensitive development** proposed near to an existing noise-generating use should include necessary acoustic design measures **for example, site layout, building orientation, uses and materials**. This will ensure new development has effective ~~sound insulation~~ **measures in place** to mitigate and minimise potential noise impact**s** or neighbour amenity issues. | Day Group Ltd | Clarification |
| MSC.3.167 | D12  Paragraph 3.12.5A | **3.12.5A On-going and longer-term management of mitigation measures should be considered, for example through a noise servicing management plan. Policy T7 Freight and servicing provides guidance on managing the impacts of freight, servicing and deliveries.** | Freight and Transport Association, UK Warehousing Association, London Industrial and Logistics Sounding Board, London Riverside BID Theatres Trust, LB Islington | Clarification and Consistency with T7 |
| MSC.3.168 | D12  Paragraph 3.12.6A | **3.12.6A The Agent of Change principle predominantly considers the impacts of noise-generating uses and activities but other nuisances should be considered under this policy. Other nuisances include dust, odour, light and vibrations should also be considered (see Policy SI1 Improving air quality and T7 Freight and servicing). This is particularly important for development proposed for co-location with industrial uses and the intensification of industrial estates (see Policy E7 Intensification, co-location and substitution, part E (4)). When considering co-location and intensification of industrial areas, boroughs should ensure that existing businesses and uses do not have unreasonable restrictions placed on them because of the new development.** | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, Thames Water Aggregates industry, London City Airport, Port of London Authority, LB Hounslow | Clarification and consistency with rest of the Plan |
| MSC.3.169 | D12 paragraph 3.12.7 | 3.12.7 Noise and other impact assessments accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the ~~noise~~ **particular** characteristics of existing uses can be properly captured and assessed. For example, ~~cultural venues~~ **some businesses and activities** can have peaks of noise at different times of the day and night and on different days of the week, and boroughs should require a noise impact assessment to take this into consideration. Boroughs should pay close attention to the assumptions made and methods used in ~~noise~~ impact assessments to ensure a full and accurate assessment. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency, Thames Water Aggregates industry, London City Airport, Port of London Authority, LB Hounslow | Clarification |
| MSC.3.170 | D12 paragraph 3.12.8 | 3.12.8 Reference should be made to Policy D13 Noise which considers the impacts of noise-generating activities on a wider scale **and Policy SI1 Improving air quality which considers the impacts of existing air** **pollution**. **Further guidance** on managing and mitigating noise in ~~mixed-use~~ development ~~and town centre development~~ is also provided in the Mayor’s London Environment Strategy. | Freight and Transport Association, UK Warehousing Association, London Riverside BID, London Councils, Environment Agency | Clarification and consistency within the Plan |
| MSC.3.171 | D13 A 2 | A ……. and other non-aviation development proposals should manage noise by:  2) reflecting the Agent of Change principle **as set out in Policy D12.** ~~to ensure measures do not add unduly to the costs and administrative burdens on existing noise-generating uses~~ |  | Clarification |
| MSC.3.172 | D13 A 3 | A …..and other non-aviation development proposals should manage noise by:  3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on **existing noise generating uses** ~~development~~ | Port of London Authority | Clarification |
| MSC.3.173 | D13 A 5 | A ……. and other non-aviation development proposals should manage noise by:  5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial uses) through the use of distance, screening, ~~or internal~~ layout, **orientation, uses or materials** – in preference to sole reliance on sound insulation. | Day Group Ltd | Clarification |
| MSC.3.174 | D13  Paragraph 3.13.1 | 3.13.1 ……….Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, for example in relation to internationally important nature conservation sites which contain noise-sensitive species. **Boroughs, developers, businesses and other stakeholders should work collaboratively to identify the existing noise climate and other noise issues to ensure effective management and mitigation measures are achieved in new development proposals** | Port of London Authority | Clarification |
| MSC.3.175 | D13  Paragraph 3.13.2 | 3.13.2……Through the application of this principle existing land uses should not be unduly ~~impacted~~ **affected** by the introduction of new noise-sensitive uses. **For noise-generating uses regard should be had to not prejudicing their potential for intensification or expansion.** | Port of London Authority | Clarification |
| MSC.3.176 | D13  Paragraph 3.13.3 | 3.13.3 The management of noise also includes promoting **good acoustic design of the inside of buildings**. Section 5 of BS 8223:2014 provides guidance on how best to achieve this. **The Institute of Acoustics has produced advice Pro:PG Planning and Noise (May 2017) that may assist with the implementation of residential developments. BS4214 provides guidance on monitoring noise issues in mixed residential/industrial areas.** | Hoare Lea LLP Chartered Institute of Building Services Engineers | Clarification |