

## Annex A

### Updated Changes to London Plan as a result of Directions

DR1	Policy H10 (A)(9)	<u>the need for additional family housing and</u> the role of one and two bed units in freeing up <u>existing</u> family housing.
DR2	Policy D3 (A) and part of (B)	<p><b>The design-led approach</b></p> <p>A All development must make the best use of land by following a design led approach that optimises the capacity of sites, including site allocations. <u>Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.</u> The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in <u>Policy D2 Infrastructure requirements for sustainable densities</u>), and that best delivers the requirements set out in Part <u>D B</u>.</p> <p><u>B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.</u></p> <p><u>C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2.</u></p> <p><u>B D</u> Development proposals should:</p>
DR2	Paragraph 3.3.1	<p>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 <u>by optimising site capacity. This means ensuring the development’s form is the most appropriate for the site and land uses meet identified needs. The design of the development must optimise site capacity. Optimising site capacity means ensuring that the development</u></p>

		<p><b>takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies.</b> The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as <b>G</b>ypsy and <b>T</b>raveller pitches – is the optimum development for the site.</p>
DR3	Paragraph 4.2.12-13	Delete Paragraph 4.2.12 and 4.2.13, re-number Paragraph 4.2.14
DR4	Policy E4(C) including footnote 103	<p>The retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B should be planned, monitored and managed, <b>having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial<sup>103</sup> floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.</b> Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in <u>Policy E7 Industrial intensification, co-location and substitution</u> <b>and supported by Policy E5 Strategic Industrial Locations (SIL).</b></p> <p><b><sup>103</sup> Defined as the overall range of uses set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function</b></p>
DR4	Paragraph 6.4.5 including footnote 108	<p>Based upon this evidence, this Plan addresses the need to <b>retain provide</b> sufficient industrial, logistics and related capacity <b>through its policies, by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS. Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio<sup>108</sup> (whichever is the greater).</b></p> <p><b><sup>108</sup> Defined as total proposed industrial floorspace (see Part A), divided by the total proposed site area. Source: London Employment Sites Database, CAG Consultants, 2017: 65 per cent is the default plot ratio assumption for industrial and warehousing sites</b></p>
DR4	Paragraphs 6.4.6 to 6.4.11	Delete para 6.4.6 – 6.4.11 and replace with the following: <b><u>6.4.6 Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing</u></b>

	including footnote 110	<p><u>and/or new appropriate locations supported by appropriate evidence.</u></p> <p><u>6.4.7 All boroughs in the Central Services Area should recognise the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable 'last mile' distribution/ logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions. This should be taken into account when assessing whether substitution is appropriate.</u></p> <p><u>6.4.8 Where industrial land vacancy rates are currently well above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these locations. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.</u></p>
DR4	Table 6.2	Delete table setting out borough categories for industrial land release/retention
DR4	Figure 6.1	Delete map showing setting out borough categories for industrial land release/retention
DR4	Policy E5(B)(4)	<u>4) strategically coordinate Development Plans to identify opportunities to substitute industrial capacity and function of Strategic Industrial Locations where evidence that alternative, more suitable, locations exist. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan. All Boroughs are encouraged to evaluate viable opportunities to provide additional industrial land in new locations to support this process. This policy should be applied in the context of Policy E7 Industrial intensification, co-location and substitution.</u>
DR4	Policy E5(D) including renumbering of E5(E) as E5(D)	<del>Development proposals for uses in SILs other than those set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a</del>

		<p><del>planning framework or Development Plan Document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.</del></p> <p><del>E</del></p>
DR4	Policy E7(C)	<p>... Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Part <del>Ds D2 to D4</del> below.</p>
DR4	Policy E7(D)	<p>The processes set out in Parts B and C above must ensure that:</p> <p>1) <del>the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing</del></p> <p>2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements</p> <p>23) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied</p> <p>34) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:</p> <p>a) safety and security</p> <p>b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict</p> <p>c) design quality, public realm, visual impact and amenity for residents</p> <p>d) agent of change principles</p> <p>e) vibration and noise</p> <p>f) air quality, including dust, odour and emissions and potential contamination.</p>

DR4	Paragraph 6.7.2	<p><del>Whilst the majority of land in SILs should be retained and intensified for the industrial type functions set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function, t</del>here may be scope for selected parts of SILs or LSISs to be consolidated <u>or appropriately substituted</u>. This should be done through a carefully co-ordinated plan-led approach <del>(in accordance with Parts B and D of Policy E7<sup>1</sup> Industrial intensification, co-location and substitution)</del> to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the <b>release of some land</b> for a mix of uses including residential. Local Plan policies' maps and/or OAPFs and masterplans <u>(as relevant)</u> should indicate clearly:</p> <p>i. the area to be retained, <u>substituted</u> and/or intensified as SIL or LSIS (and to provide future capacity for the uses set out in <u>Policy E5 Strategic Industrial Locations (SIL)</u> and <u>Policy E6 Locally Significant Industrial Sites</u>) and</p> <p>ii. the area to be released from SIL or LSIS (see illustrative examples in Figure 6.3). Masterplans should cover the whole of the SIL or LSIS, and should be informed by the operational requirements of existing and potential future businesses.</p>
DR4	Paragraph 2.1.16	<p>Southwark is preparing an Area Action Plan (AAP) which will set out how the BLE will enable significant residential and employment growth. The Old Kent Road OA contains the last remaining significant areas of Strategic Industrial Locations that lie in close proximity to the CAZ and the only SILs within Southwark. The AAP should <del>plan for no net loss of industrial floorspace capacity</del> <b>and</b> set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses within designated town centres. Workspace for the existing creative industries should also be protected and supported.</p>
DR4	Paragraph 2.1.33	<p>The Planning Framework should quantify the full development potential of the area as a result of Crossrail 2. It should ensure that industrial, logistics and commercial uses continue to form part of the overall mix of uses in the area, <del>with no net loss of industrial floorspace capacity,</del> and that opportunities for intensification of industrial land and co-location of industrial and residential uses are fully explored. Tottenham and Walthamstow contain clusters of</p>

<sup>1</sup> See also paragraphs 6.4.5 to 6.4.8 for definition of industrial floorspace capacity

		creative industries which should be protected and supported. The Planning Framework should also protect and improve sustainable access to the Lee Valley Regional Park and reservoirs, and ensure links through to Hackney Wick and the Lower Lea Valley. Planning frameworks should include an assessment of any effects on the Epping Forest Special Area of Conservation and appropriate mitigation strategies.
DR4	Paragraph 2.1.53	Housing Zone status and investment by Peabody in estate renewal in the area will improve the quality of the environment and bring new housing opportunities. To deliver wider regeneration benefits to Thamesmead, other interventions to support the growth of the Opportunity Area are needed. These include: the redevelopment and intensification of employment sites to enable a range of new activities and workspaces to be created in parallel with new housing development; a review of open space provision in the area to create better quality, publicly accessible open spaces; the creation of a new local centre around Abbey Wood station, the revitalisation of Thamesmead town centre and Plumstead High Street; and improved local transit connections. <b><del>The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.</del></b>
DR4	Paragraph 2.1.56	Industrial and logistics uses will continue to play a significant role in the area. <b><del>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.</del></b> Belvedere is recognised as having potential as a future District centre.
DR5	Policy G2	<p>A The Green Belt should be protected from inappropriate development:</p> <p>1) development proposals that would harm the Green Belt should be refused <b><u>except where very special circumstances exist</u></b></p> <p>2) <b><u>subject to national planning policy tests,</u></b> the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.</p> <p>B <b><u>Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not be supported.</u></b></p>

DR6	Policy G3(A)	<p>Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt:</p> <p>1) <del>Development proposals that would harm MOL should be refused.</del> MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt</p> <p>2) boroughs should work with partners to enhance the quality and range of uses of MOL.</p>
DR6	Policy G3(C)	<p>Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, <u>taking into account the purposes for including land in MOL set out in Part B ensuring that the quantum of MOL is not reduced, and that the overall value of the land designated as MOL is improved by reference to each of the criteria in Part B.</u></p>
DR7	Policy H14 and supporting text	<p><del>Delete Policy H14 B in its entirety.</del></p> <p>Modify Policies C and D as follows:</p> <p>C. Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for <del>Gypsy and Traveller</del> <b>gypsy and traveller</b> accommodation provided in Table 4.4 as identified need for pitches until a needs assessment, <del>using the definition set out above</del>, is undertaken as part of their Development Plan review process.</p> <p>D. Boroughs that have undertaken a needs assessment since 2008 should update this <del>based on the definition set out above</del> as part of their Development Plan review process</p> <p><del>Delete supporting text paragraphs 4.14.1, 4.14.2, 4.14.3, 4.14.4, 4.14.7 and re-number remaining paragraphs</del></p> <p>In Policy H14 sections A, E and G and supporting text paragraphs 4.14.5, 4.14.6, 4.14.8, 4.14.9, 4.14.11 and 4.14.12:  Replace the terms 'Gypsy and Traveller' and 'Gypsies and Travellers' respectively with the phrases <b>gypsy and traveller and gypsies and travellers</b> in line with PPTS.</p>
DR8	Paragraph 0.0.21	<p>The Plan provides an appropriate spatial strategy that plans for London's growth in a sustainable way <del>and has been found sound by the planning inspectors through the examination in public</del>. The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development, <u>unless they have additional evidence that</u></p>

suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan.

DR9	Table 10.3	<b>Location</b>	<b><u>Number of beds</u></b>	<b>Maximum parking provision*</b>
		Central Activities Zone	<b><u>All</u></b>	Car free
		Inner London Opportunity Areas		
		Metropolitan and Major Town Centres		
		All areas of PTAL 5 – 6		
		Inner London PTAL 4		
		Inner London PTAL 3	<b><u>All</u></b>	Up to 0.25 spaces per dwelling
		Inner London PTAL 2	<b><u>All</u></b>	Up to 0.5 spaces per dwelling
		<del>Outer London PTAL 4</del>		
		Outer London Opportunity Areas		
		Inner London PTAL 0 – 1	<b><u>All</u></b>	Up to 0.75 spaces per dwelling
		<del>Outer London PTAL 3</del>		
		<del>Outer London PTAL 4</del>	<b><u>1 – 2</u></b>	<b><u>Up to 0.5 - 0.75 spaces per dwelling*</u></b>
		<del>Outer London PTAL 4</del>	<b><u>3+</u></b>	<b><u>Up to 0.5 - 0.75 spaces per dwelling*</u></b>
		<del>Outer London PTAL 2 – 3</del>	<b><u>1 – 2</u></b>	<b><u>Up to 0.75 spaces per dwelling</u></b>
		Outer London PTAL <del>2 – 3</del>	<b><u>3+</u></b>	Up to 1 space per dwelling
		<del>Outer London PTAL 0 – 1</del>	<b><u>1 – 2</u></b>	<b><u>Up to 1.5 space per dwelling</u></b>
		Outer London PTAL 0 – 1	<b><u>3+</u></b>	Up to 1.5 spaces per dwelling ^
<p>* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed</p> <p>~ With the exception of disabled persons parking, see Part G Policy T6.1 Residential Parking</p>				

		<p><b><u>+ When considering development proposals that are higher density or in more accessible locations, the lower standard shown here should be applied as a maximum.</u></b></p> <p><b><u>^ Boroughs should consider standards that allow for higher levels of provision where there is clear evidence that this would support additional family housing. Where small units (generally studios and one bedroom flats) make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit</u></b></p>
DR10	Policy T6.3(A) Retail Parking Standards	The maximum parking standards set out in Table 10.5 should be applied to new retail development, <b><u>unless alternative standards have been implemented in a Development Plan through the application of Policy G below</u></b> . New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in <u>Policy SD7 Town centres: development principles and Development Plan Documents</u> .
DR10	Policy T6.3(G) NEW	<b><u>G. Boroughs may consider alternative standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in: a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach. b. A significant reduction in the viability of mixed-use redevelopment proposals in town centre.</u></b>
DR11	Paragraphs 4.1.11 to 4.1.13	Delete paragraph 4.1.11 and re-number remaining paragraphs.