

Direction	Intention to Publish London Plan Policy	Modification to Remedy National Policy Inconsistency New text is shown as <b>bold red</b> and deleted text as <del>red-strikethrough</del>	Statement of Reasons
DR1	Policy H10	<p>Modify H10.9 as follows:</p> <p>9) <b>the need for additional family housing</b> and the role of one and two bed units in freeing up <b>existing</b> family housing</p>	<p>London has a strong need for family homes, as set out in the SHMA, the modification set out in the direction is to address this need and help provide the homes needed – which otherwise will force families to move outside of London to find suitable housing and put further pressure on the areas surrounding the capital.</p> <p>The 2012 NPPF paragraph 50 states that plans should deliver a ‘wide choice of quality homes’ and ‘plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children,...)’. The modification to policy H10.9 will bring the London Plan back into conformity with National Policy by being more explicit about meeting the needs of this group.</p>
DR2	Policy D3 (and supporting text paragraph 3.3.1)	<p>Modify D3 as follows:</p> <p><b>A The design of the development must optimise site capacity. Optimising site capacity means ensuring that development takes the most appropriate form for the site. Higher density developments should be promoted in areas that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.</b></p> <p><b>B Where there are existing clusters of high density buildings, expansion of the clusters should be positively considered by Boroughs. This could also include expanding Opportunity Area boundaries where appropriate.</b></p> <p><b>D Gentle densification should be actively encouraged by Boroughs in low- and mid- density locations to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2.</b></p> <p><del>D A</del> All development must make the best use of land by following a design led approach that optimises the capacity of sites, including site allocations. 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 B.</p> <p><b>E B</b> Development proposals should:</p> <p>3.3.1 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. <del>The design of the development must optimise site capacity. Optimising site capacity means ensuring that the development takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies.</del> The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as <del>Gypsy and Traveller</del> <b>gypsy and traveller</b> pitches – is the optimum development for the site.</p>	<p>The 2012 NPPF sets out that policies “should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development...” (Paragraph 59)</p> <p>The policy as set out in the ItP London Plan gives little guidance as to the most suitable locations for higher density development – which could lead to inappropriate development or not maximising the potential of sites capable of delivering high density development. By not maximising the density of a site to reach its potential the Plan risks not delivering the homes and employment space that is needed.</p>

<p><b>DR3</b></p>	<p>Policy H2 (and supporting text paragraphs 4.2.1 to 4.2.14)</p>	<p>Delete 4.2.12 and 4.2.13 in their entirety</p>	<p>The ItP London Plan undermines national approach and will lead to confusion for applicants and decision makers. The Inspectors' report recommended the deletion of these paragraphs.</p> <p>Approach is inconsistent with Written Ministerial Statement (HCWS50) made by Minister of State for Housing and Planning Brandon Lewis on 28th November 2014 which sets out that affordable housing and tariff style contributions should not be sought on developments of 10 units or less.</p>
<p><b>DR4</b></p>	<p>Policy E4 Policy E5 Policy E7  Policy SD1 And relevant supporting text paragraphs</p>	<p>Modify E4 as follows</p> <p>C 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. <del>., having regard to the industrial property market area and borough level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.</del> Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Industrial intensification, co-location and substitution <b>and supported by Policy E5 Strategic Industrial Land.</b></p> <p>Modify supporting text paragraph 6.4.5 as follows</p> <p>6.4.5 Based upon this evidence, this Plan addresses the need to <del>retain</del> <b>provide</b> sufficient industrial, logistics and related capacity <del>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 (whichever is the greater).</del></p> <p>Delete supporting text paragraphs 6.4.6 through 6.4.11</p> <p>Delete Table 6.2</p> <p>Delete Figure 6.1</p> <p>Add new supporting text paragraph 6.4.6</p> <p><b>6.4.6 Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence.</b></p> <p>Add new supporting text 6.4.7</p> <p><b>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</b></p>	<p>At paragraph 421 of the Inspectors' Report, the Panel concluded that "the approach to meeting those needs set out in E4 to E7 is aspirational but may not be realistic" and this appears to be inconsistent with paragraph 7 of the NPPF 2012 which requires "that sufficient land of the right type is available in the right places and at the right time to support growth and innovation".</p> <p>This addition would make it easier for London Boroughs to identify a supply of industrial land to meet demand, or to replace other land that can subsequently be released for housing development. It also removes a target that was deemed 'may not be realistic' and therefore meets the 'effective' test of soundness.</p> <p>Relevant paragraphs in the 2012 NPPF are noted below;</p> <p>Paragraphs 7 and 17 on 'by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation' 'sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.'</p> <p>Paragraph 156 states that strategic policies should deliver the homes and jobs needed in the area and the provision of commercial development.</p> <p>Paragraph 161 states that the authority must assess 'the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.'</p>

**management and recycling, and land to support transport functions. This should be taken into account when assessing whether substitution is appropriate.**

Add new supporting text 6.4.8

**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.**

Modify E5 as follows

B Boroughs, in their Development Plans, should:

...

**4) Strategically coordinate Development Plans to identify opportunities to substitute Strategic Industrial Land 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 or as part of a coordinated masterplanning process in collaboration with the GLA and relevant borough. 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.**

~~D 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 planning framework or Development Plan Document review process and adopted as policy in a Development Plan or as part of a coordinated masterplanning process in collaboration with the GLA and relevant borough.~~

Modify E7 as follows

D The processes set out in Parts B and C above must ensure that:

~~1) 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~~

- 1) 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
- 2) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied
- 3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:
  - a. safety and security
  - b. the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict
  - c. design quality, public realm, visual impact and amenity for residents
  - d. agent of change principles
  - e. vibration and noise
  - f. air quality, including dust, odour and emissions and potential contamination.

Modify 6.7.2

~~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~~There may be scope for selected parts of SILs or LSISs to be consolidated **or appropriately substituted**. This should be done through a carefully co-ordinated plan-led approach ~~(in accordance with Parts B and D of Policy E7 Industrial intensification, colocation and substitution)~~ to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses including residential. Local Plan policies' maps and/or OAPFs and masterplans should indicate clearly:

- i. the area to be retained and intensified as SIL or LSIS (and to provide future capacity for the uses set out in Policy E5 Strategic Industrial Locations (SIL) and Policy E6 Locally Significant Industrial Sites) and
- 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.

Modify supporting text paragraphs for policy SD1 as follows

2.1.16 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 ~~plan for no net loss of industrial floorspace capacity and~~ 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.

2.1.33 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, ~~with no net loss of industrial floorspace capacity,~~ 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 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.

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. ~~The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.~~

2.1.56 Industrial and logistics uses will continue to play a significant role in the area. ~~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.

<p><b>DR5</b></p>	<p>Policy G2 (and supporting paragraphs 8.2.1 and 8.2.2)</p>	<p>Modify Policy G2 as follows:</p> <p>A. The Green Belt should be protected from inappropriate development:</p> <ol style="list-style-type: none"> <li>1. development proposals that would harm the Green Belt should be refused <b>except where very special circumstances exist;</b></li> <li>2. <b>subject to national planning policy tests,</b> the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.</li> </ol> <p>B. <b>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.</b></p>	<p>Policy G2 as set out in the ItP London Plan is not consistent with national policy and will lead to confusion for applicants, communities and decision makers. The policy as it stands is inconsistent with the 2012 NPPF (paras 79 – 92) due to the lack of reference to exceptional circumstances.</p> <p>This inconsistency was noted in the Inspectors' Report and their recommendation PR36 will resolve these inconsistencies.</p>
<p><b>DR6</b></p>	<p>Policy G3 (and supporting text paragraphs 8.3.1 through 8.3.4)</p>	<p>Modify Policy G3 as follows:</p> <p>A. Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2) boroughs should work with partners to enhance the quality and range of uses of MOL.</li> </ol> <p>B. The extension of MOL designations should be supported where appropriate. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:</p> <ol style="list-style-type: none"> <li>1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area</li> <li>2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London</li> <li>3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value</li> <li>4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.</li> </ol> <p>C. 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, <del>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.</del></p>	<p>Mayor's use of Green Belt definition and prohibition of a net loss is not consistent with the NPPF and is likely to lead to confusion for applicants, communities and decision makers.</p> <p>The Inspectors' report recommends that the policy is made consistent with National Policy as set out in paragraphs 79-92 of the 2012 NPPF.</p>
<p><b>DR7</b></p>	<p>Policy H14 (and supporting text paragraphs 4.14.1 through 4.14.13)</p>	<p>Delete Policy B in its entirety.</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>Delete supporting text paragraphs 4.14.1, 4.14.2, 4.14.3, 4.14.4, 4.14.7</p>	<p>The policy is inconsistent with national policy set out in the Planning Policy for Traveller Sites (PPTS) (August 2015). The policy gives a wider definition of "gypsies and travellers" compared to that in Annex 1 of the PPTS including those who have permanently settled.</p> <p>The panel of Inspectors examining the plan concluded that the Mayor failed to demonstrate that London was so distinctly different to elsewhere in the country to justify a departure from national policy.</p>

		<p>In Policies 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:</p> <p>Replace the terms ‘Gypsy and Traveller’ and ‘Gypsies and Travellers’ respectively with the phrases <b>gypsy and traveller</b> and <b>gypsies and travellers</b> in line with PPTS.</p>	<p>The panel highlighted that a different definition would create anomalies with individuals defined differently for planning purposes on whether they are assessed by a district outside London or one of the boroughs. This could also impact on proposals for joint working as set out in the PPTS.</p> <p>The Housing and Planning Act 2016 replaced the duty to assess the needs of gypsy and travellers, with a duty on local housing authorities to consider the needs of people residing in or resorting to their District with respect to the provision of sites on which caravans are stationed. Therefore, the needs of those outside the PPTS definition must be considered as part of this assessment.</p> <p>A Written Ministerial Statement (WMS) of 22 July 2015 set out that those travellers who do not fall within the definition set out in the PPTS should have their accommodation needs addressed under the provisions of the National Planning Policy Framework.</p> <p>As a consequence of directing the Mayor to accept the Inspector’s recommendations and to delete Part B of the Policy we are also seeking a direction to the proposed Policy H14(C) and (D) as the wording requires authorities to undertake a needs assessment in accordance with the proposed definition in Part (B) of the Policy. We are also ensuring that references to gypsies and travellers are consistent in line with PPTS.</p>						
<p><b>DR8</b></p>	<p>Introducing the Plan A New Plan</p>	<p>Modify 0.0.21:</p> <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, <b>unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this plan.</b>”</p>	<p>The text as set out in the ItP London plan will potentially discourage London Boroughs that may be able to exceed their housing target. The approach is not consistent with the 2012 NPPF paras 46, 153, 156 and 159. due to the Plan planning for significantly below London’s housing need.</p>						
<p><b>DR9</b></p>	<p>Table 10.3</p>	<p>Delete Table 10.3 Maximum Parking Standards and replace with the table below:</p> <table border="1" data-bbox="825 1780 1733 1980"> <thead> <tr> <th data-bbox="825 1780 1157 1843">Location</th> <th data-bbox="1157 1780 1469 1843">Maximum Parking Provision*</th> <th data-bbox="1469 1780 1733 1843">Number of Beds</th> </tr> </thead> <tbody> <tr> <td data-bbox="825 1843 1157 1980">Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres</td> <td data-bbox="1157 1843 1469 1980">Car free~</td> <td data-bbox="1469 1843 1733 1980">N/A</td> </tr> </tbody> </table>	Location	Maximum Parking Provision*	Number of Beds	Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres	Car free~	N/A	<p>The parking standards as set out in the ItP London Plan are inconsistent with national policy. The 2016 Minor Alterations to the London Plan introduced Parking Standards for residential policy to meet the requirements as per the Written Ministerial Statement of 25 March 2015 that ‘clear and compelling justification’ is required when introducing parking standards. The Mayor has not</p>
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DR10	Policy T6.3 Retail parking	<p>Modify T6.3 as follows:</p> <p>A. The maximum parking standards set out in Table 10.5 should be applied to new retail development, <b>unless alternative standards have been implemented in a Borough Plan through the application of Policy G below</b>. New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in Policy SD7 Town centres: development principles and Development Plan Documents.</p> <p>...</p> <p><b>G. Boroughs should consider alternative standards where there is clear that evidence that the standards in Table 10.5 would result in:</b></p> <ol style="list-style-type: none"> <li>a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach.</li> <li>b. A significant reduction in the viability of mixes-use redevelopment proposals in town centre.</li> </ol>	<p>Paragraph 39 of the 2012 NPPF is clear that in setting local parking standards for non-residential development, policies should take into account:</p> <ol style="list-style-type: none"> <li>(a) the accessibility of the development;</li> <li>(b) the type, mix and use of development;</li> <li>(c) the availability of and opportunities for public transport;</li> <li>(d) local car ownership levels; and</li> <li>(e) an overall need to reduce the use of high-emission vehicles</li> </ol> <p>As was raised in a number of representations, local car ownership rates and accessibility in a number of town centre locations would see the result of Table 10.5’s implementation divert traffic to out-of-town locations and increase the length of trips. It was also raised that in relation to the type use and mix of development that the policies could reduce the viability of mixed-use redevelopment. As a result the proposed Direction will allow Boroughs to diverge from the Mayor’s standards in Table 10.5 where these potential negative impacts can be evidenced.</p>																											

<b>DR11</b>	Policy H1 Supporting text paragraph 4.1.11	Delete 4.1.11 in its entirety	<p>The Plan's text undermines the national HDT approach and is likely to lead to confusion for applicants, communities and decision makers. It does not provide an effective framework for Boroughs, in line with paragraph 182 of the NPPF.</p> <p>The Housing Delivery Test is a key Government policy to help drive the delivery of new homes. The ItP London Plan in its current state is not consistent with the Housing Delivery Test Rulebook or the 2019 NPPF which first introduced the Housing Delivery Test.</p>
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