

**Annex C: Schedule of modifications to the Intend to Publish London Plan (December 2019) as set out in the Publication London Plan (December 2020)**

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**Modifications to address the Secretary of State’s directions – in order of directions**

Direction	London Plan (Intend to Publish) Ref	Tracked change text
DR1	Policy H10 (A)(9)	<b><u>the need for additional family housing and</u></b> the role of one and two bed units in freeing up <b><u>existing</u></b> 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. <b><u>Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.</u></b> 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><u>D</u></b>.</p> <p><b><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</u></b></p>

		<p><u>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 takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies.</u> The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as <del>G</del>ypsy and <del>T</del>raveller pitches – is the optimum development for the site.</p>
DR3	Paragraphs 4.2.12 and 4.2.13	<p><del>4.2.12 As demonstrated by the 2017 SHMA, London has significant unmet need for affordable housing. For many boroughs, developments of nine or fewer units are a significant source of housing supply and play an important role in contributing to affordable housing delivery, often via cash in lieu contributions which are then used as part of borough-wide affordable housing programmes. Given the important role these sites play, the Mayor believes that boroughs should be capable of securing cash in lieu contributions for affordable housing contributions from such sites. Therefore, boroughs are encouraged to require affordable housing contributions from developments of nine or fewer units where supported by local evidence.</del></p> <p><del>4.2.13 For practical reasons associated with on-site provision of a small number of affordable units (such as management), affordable housing requirements from developments of nine or fewer units should be asked for as a cash in lieu contribution, rather than as an on-site contribution, and boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to</del></p>

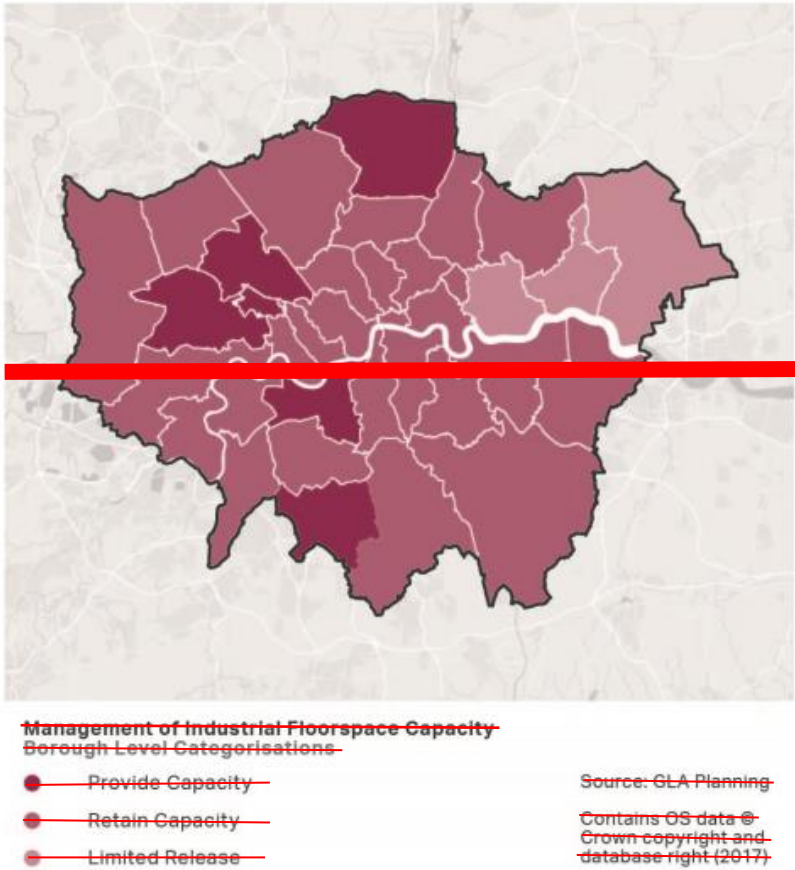
		<p><del>the occupation of development, rather than prior to commencement of development in these instances. Boroughs should have an identified programme through which additional affordable homes will be delivered. Flexibility should be allowed in the timing of payments in recognition of the distinct economics of small and medium-sized housebuilders and to reduce their up-front costs.</del></p>
DR3	Paragraph 4.2.14	Renumber as 4.2.11
DR4	Policy E4(C) including footnote 104	<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, <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<sup>104</sup> 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 <u>Policy E7 Industrial intensification, co-location and substitution</u> <u>and supported by Policy E5 Strategic Industrial Locations (SIL).</u></p> <p><del><sup>104</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</del></p>
DR4	Paragraph 6.4.5 including footnote 109	<p>Based upon this evidence, this Plan addresses the need to <del>retain</del> <u>provide</u> sufficient industrial, logistics and related capacity <u>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>109</sup> (whichever is the greater).</u></p> <p><del><sup>109</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</del></p>

		<p><del>cent is the default plot ratio assumption for industrial and warehousing sites</del></p>
DR4	<p>Paragraphs 6.4.6 to 6.4.11 including footnote 110</p>	<p><u>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.</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 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. Boroughs proposing changes through a Local Plan to Green Belt or MOL boundaries (in line with Policy G2 London’s Green Belt and Policy G3 Metropolitan Open Land) to accommodate their London Plan housing target should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land in active employment use. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.</u></p> <p><del>6.4.6 When applying the principle of no net loss of industrial floorspace capacity regard should be given to the characteristics and operational requirements of the different industrial uses set out in Part A. Yard space is an essential requirement for most industrial, logistics and related uses to support servicing, storage and operational needs. Development proposals should ensure that sufficient yard space is provided having regard to the operational requirements of the uses proposed.</del></p>

		<p><del>6.4.7— Some industrial uses may require a significant amount of yard and servicing space, such as cross-docking facilities. In some instances, this may provide exceptional justification for a plot ratio that is lower than 65 per cent on development for industrial uses only (those listed in Part A of this policy). For this exceptional approach to apply, it should be demonstrated that it is not feasible to achieve no net loss of industrial floorspace capacity through alternative configurations, multi-storey industrial development, a wider mix of industrial uses, or other appropriate means. This exceptional approach would not apply to industrial developments that are being proposed as part of the processes of SIL / LSIS consolidation and industrial / residential / non-industrial co-location set out in Part B of <u>Policy E7 Industrial intensification, co-location and substitution, including land swaps.</u></del></p> <p><del>6.4.8— Mezzanine space should be excluded from calculations of industrial floorspace capacity. The principle of no net loss of industrial floorspace capacity applies to overall areas of SIL and LSIS, and not necessarily to individual sites within them. The principle of no net loss of floorspace capacity does not apply to sites used for utilities infrastructure or land for transport functions which are no longer required.</del></p> <p><del>6.4.9— Guidance on the approach to be taken to the management of industrial floorspace capacity at borough level and across industrial property market areas is provided in Figure 6.1 and Table 6.2. Boroughs in the ‘Provide Capacity’ category are those where strategic demand for industrial, logistics and related uses is anticipated to be the strongest.<sup>110</sup> They should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water.</del></p> <p><del>Footnote <sup>110</sup> CAG Consulting, London Industrial Land Demand Study, GLA 2017</del></p> <p><del>6.4.10 Boroughs in the ‘Retain’ category should seek to</del></p>
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		<p><del>intensify industrial floorspace capacity following the general principle of no net loss across designated SIL and LSIS. All boroughs in the Central Services Area fall within this category in recognition of 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.</del></p> <p><del>6.4.11 There are three boroughs in the ‘Limited Release’ category (all in the Thames Gateway) where industrial land vacancy rates are currently well above the London average. These boroughs are encouraged to intensify industrial floorspace capacity, investigate the reasons for high levels of vacancy, take positive steps to bring vacant sites back into industrial use where there is demand and support the re-use of surplus industrial land and floorspace for other uses through a proactive plan-led approach.</del></p>																																				
DR4	Table 6.2	<p><del>Table 6.2— Management of industrial floorspace capacity— industrial property market area and borough-level categorisations</del></p> <table border="1" data-bbox="564 1189 1409 2018"> <thead> <tr> <th data-bbox="564 1189 987 1274"><del>Property Market Area / Borough</del></th> <th data-bbox="987 1189 1409 1274"><del>Categorisation</del></th> </tr> </thead> <tbody> <tr> <td data-bbox="564 1274 987 1321"><del>Central Services Area</del></td> <td data-bbox="987 1274 1409 1321"><del>Central Services Area</del></td> </tr> <tr> <td data-bbox="564 1321 987 1366"><del>Camden</del></td> <td data-bbox="987 1321 1409 1366"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1366 987 1411"><del>City of London</del></td> <td data-bbox="987 1366 1409 1411"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1411 987 1456"><del>Hackney</del></td> <td data-bbox="987 1411 1409 1456"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1456 987 1500"><del>Islington</del></td> <td data-bbox="987 1456 1409 1500"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1500 987 1545"><del>Kensington &amp; Chelsea</del></td> <td data-bbox="987 1500 1409 1545"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1545 987 1590"><del>Lambeth</del></td> <td data-bbox="987 1545 1409 1590"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1590 987 1635"><del>Lewisham</del></td> <td data-bbox="987 1590 1409 1635"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1635 987 1680"><del>LLDC</del></td> <td data-bbox="987 1635 1409 1680"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1680 987 1724"><del>Southwark</del></td> <td data-bbox="987 1680 1409 1724"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1724 987 1769"><del>Tower Hamlets</del></td> <td data-bbox="987 1724 1409 1769"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1769 987 1814"><del>Westminster</del></td> <td data-bbox="987 1769 1409 1814"><del>Retain capacity</del></td> </tr> <tr> <td colspan="2" data-bbox="564 1814 1409 1859"><del>Thames Gateway</del></td> </tr> <tr> <td data-bbox="564 1859 987 1904"><del>Barking &amp; Dagenham</del></td> <td data-bbox="987 1859 1409 1904"><del>Limited release</del></td> </tr> <tr> <td data-bbox="564 1904 987 1948"><del>Bexley</del></td> <td data-bbox="987 1904 1409 1948"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1948 987 1993"><del>Bromley</del></td> <td data-bbox="987 1948 1409 1993"><del>Retain capacity</del></td> </tr> <tr> <td data-bbox="564 1993 987 2018"><del>Greenwich</del></td> <td data-bbox="987 1993 1409 2018"><del>Retain capacity</del></td> </tr> </tbody> </table>	<del>Property Market Area / Borough</del>	<del>Categorisation</del>	<del>Central Services Area</del>	<del>Central Services Area</del>	<del>Camden</del>	<del>Retain capacity</del>	<del>City of London</del>	<del>Retain capacity</del>	<del>Hackney</del>	<del>Retain capacity</del>	<del>Islington</del>	<del>Retain capacity</del>	<del>Kensington &amp; Chelsea</del>	<del>Retain capacity</del>	<del>Lambeth</del>	<del>Retain capacity</del>	<del>Lewisham</del>	<del>Retain capacity</del>	<del>LLDC</del>	<del>Retain capacity</del>	<del>Southwark</del>	<del>Retain capacity</del>	<del>Tower Hamlets</del>	<del>Retain capacity</del>	<del>Westminster</del>	<del>Retain capacity</del>	<del>Thames Gateway</del>		<del>Barking &amp; Dagenham</del>	<del>Limited release</del>	<del>Bexley</del>	<del>Retain capacity</del>	<del>Bromley</del>	<del>Retain capacity</del>	<del>Greenwich</del>	<del>Retain capacity</del>
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		<del>Havering</del>	<del>Limited-release</del>
		<del>Newham</del>	<del>Limited-release</del>
		<del>Redbridge</del>	<del>Retain capacity</del>
		<del>Lee Valley</del>	
		<del>Enfield</del>	<del>Provide capacity</del>
		<del>Haringey</del>	<del>Retain capacity</del>
		<del>Waltham Forest</del>	<del>Retain capacity</del>
		<del>Park Royal/Heathrow</del>	
		<del>Barnet</del>	<del>Retain capacity</del>
		<del>Brent</del>	<del>Provide capacity</del>
		<del>Ealing</del>	<del>Provide capacity</del>
		<del>Hammersmith &amp; Fulham</del>	<del>Retain capacity</del>
		<del>Harrow</del>	<del>Retain capacity</del>
		<del>Hillingdon</del>	<del>Retain capacity</del>
		<del>Hounslow</del>	<del>Retain capacity</del>
		<del>OPDC</del>	<del>Provide capacity</del>
		<del>Richmond</del>	<del>Retain capacity</del>
		<del>Wandle Valley</del>	
		<del>Croydon</del>	<del>Retain capacity</del>
		<del>Kingston</del>	<del>Retain capacity</del>
		<del>Merton</del>	<del>Retain capacity</del>
		<del>Sutton</del>	<del>Provide capacity</del>
		<del>Wandsworth</del>	<del>Provide capacity</del>
DR4	Figure 6.1	<del>Figure 6.1 – Management of industrial floorspace capacity – borough level categorisations</del>	

		 <p><b>Management of Industrial Floorspace Capacity Borough Level Categorisations</b></p> <ul style="list-style-type: none"> <li>● Provide Capacity</li> <li>● Retain Capacity</li> <li>● Limited Release</li> </ul> <p>Source: GLA Planning Contains OS data © Crown copyright and database right (2017)</p>
DR4	Policy E5(B)(4)	<p><u><b>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.</b></u></p>
DR4	Policy E5(D) including renumbering of E5(E) as E5(D)	<p><del><b>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 co-ordinated masterplanning process in</b></del></p>



		<p><del>collaboration with the GLA and relevant borough.</del></p> <p><b>E</b></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>D5-D2 to D4</del> below.</p>
DR4	Policy E7(D) including renumbering	<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><b>2)</b> 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><b>23)</b> the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied</p> <p><b>34)</b> appropriate design mitigation is provided in any residential element to ensure compliance with <b>1 and 2</b> 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	<del>Whilst the majority of land in SILs should be retained</del>

		<p><del>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>There 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 and</del> 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</p>

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

		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.
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. <del>The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.</del>
DR4	Paragraph 2.1.56	Industrial and logistics uses will continue to play a significant role in the area. <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> Belvedere is recognised as having potential as a future District centre.
DR4	Footnote 59	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. For the purposes of <u>Policy H5 Threshold approach to applications</u> , this floorspace-based approach applies to sites used for utilities infrastructure or land for transport functions that are no longer required, <del>regardless of the provisions of paragraph 6.4.8.</del> However, it is recognised that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination,

		enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available.
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, <b><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></b></p>
DR7	Policy H14	<p>A Boroughs should plan to meet the identified need for permanent <del>G</del>gypsy and <del>T</del>traveller pitches and must include ten-year pitch targets in their Development Plan</p>

		<p>Documents.</p> <p><del>B As of the start of this Plan period, boroughs should use the following definition of ‘Gypsies and Travellers’ as a basis for assessing need: People with a cultural tradition of nomadism, a nomadic habit of life, or living in a caravan, whatever their race or origin, including:</del></p> <p><del>1) those who are currently travelling or living in a caravan</del></p> <p><del>2) those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation</del></p> <p><del>3) those who, on grounds of their own or their family’s or dependants’ educational or health needs or old age, have ceased to travel temporarily or permanently.</del></p> <p><b>C</b> Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for <b>G</b>ypsy and <b>T</b>raveller 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><b><del>C</del>D</b> 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><b><del>D</del>E</b> Boroughs should undertake an audit of existing local authority provided <b>G</b>ypsy and <b>T</b>raveller sites and pitches, working with residents occupying these, identifying:</p> <ol style="list-style-type: none"> <li>1) areas of overcrowding</li> <li>2) areas of potential extra capacity within existing sites</li> <li>3) pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space</li> </ol>
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		<p>and landscaping).</p> <p><del>EF</del> Boroughs should plan to address issues identified in the audits.</p> <p><del>FG</del> Boroughs should actively plan to protect existing <del>G</del>ypsy and <del>T</del>raveller and Travelling Showpeople or circus people pitch or plot capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.</p>
DR7	Paragraphs 4.14.1 to 4.14.13 including footnote 74	<p><del>4.14.1 Estimates show there are around 30,000 Gypsies and Travellers in London.<sup>74</sup> Their culture and traditions have developed through a nomadic way of life over centuries, and although many Gypsies and Travellers try to maintain this, the lack of pitches on local authority sites often presents a barrier to this. Around 85 per cent of Gypsy and Traveller families in London have been forced to live in housing, or on roadside encampments due to overcrowding, or an unsuitability, or lack of availability of, pitches. The lack of access to secure accommodation and suitable living environments has far reaching implications for their physical and mental health, welfare, education, employment and access to the wider opportunities London has to offer.</del></p> <p><del><sup>74</sup>: <a href="http://www.londongypsiesandtravellers.org.uk/why-were-needed/">http://www.londongypsiesandtravellers.org.uk/why-were-needed/</a></del></p> <p><del>4.14.2 In this Plan, the Mayor has adopted a new definition for Gypsies and Travellers. This is due to concerns that the existing Government planning definition does not recognise many Gypsies and Travellers, for example:</del></p> <ul style="list-style-type: none"> <li><del>——• Gypsies and Travellers who have ceased to travel permanently due to a lack of available permanent pitches, transit sites or stopping places; frequent enforcement action (evictions); or lack of opportunities and barriers to work</del></li> <li><del>——• Gypsies and Travellers who live in (bricks and mortar) housing due to the lack of sufficient, affordable and good quality caravan site provision; or</del></li> <li><del>——• due to their own or their family's or dependants' educational or health needs or old age. This is most</del></li> </ul>

		<p><del>likely to affect Gypsies and Travellers who face multiple and intersecting inequalities (for example older people, disabled Gypsies and Travellers, women and single parents).</del></p> <p><del>4.14.3 For these groups, it is often very difficult or impossible to demonstrate that they would have immediate plans to travel for work in the future (as required by the current Government planning definition) because there are no viable options or because doing so would have a significant impact on their health, wellbeing and security of income.</del></p> <p><del>4.14.4 This often results in Gypsies and Travellers not being recognised or counted in needs assessments, with many needs assessments identifying zero need. This has a direct impact on the accommodation options available to Gypsies and Travellers and their ability to retain their cultural status and identity, which can lead to greater inequalities in terms of access to safe and secure accommodation, health care and education.</del></p> <p><del>4.14.7 The new definition should be used within London for the purposes of assessing accommodation need, and auditing and protecting existing sites and pitches.</del></p> <p>4.14.<u>19</u> Boroughs should <b>actively plan for Gypsy and Travellers’ accommodation needs</b>, and should ensure that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.</p> <p>4.14.<u>28</u> The Mayor will initiate and lead a <b>London-wide Gypsy and Traveller accommodation needs assessment</b>, and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation. Until the findings of this new London-wide needs assessment are available for use in Development Plans boroughs should continue to plan to meet the need for permanent Gypsy and Traveller pitches in accordance with the requirements of Policy H14, with a particular focus on Part <b>BC</b> .</p>
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		<p>4.14.5.35 Insufficient pitch provision can <b>also</b> lead to a rise in <b>unauthorised encampments</b>, with implications for the health and wellbeing of <b>Ggypsy</b> and <b>Tt</b>ravellers, community cohesion and costs for boroughs.</p> <p>4.14.46 It is acknowledged that, in addition to permanent sites, suitable <b>short-term sites</b> are an important component of the suite of accommodation for <b>Ggypsy</b> and <b>Tt</b>ravellers. Research is currently underway to understand how a ‘negotiated stopping’ approach could work in London as a way of minimising the number of unauthorised encampments.</p> <p>4.14.510 To assist boroughs in meeting identified need, <b>Mayoral funding</b> will be available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches.</p> <p>4.14.611 Where <b>new Ggypsy and Tt</b>raveller pitches are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.</p> <p>4.14.712 If existing <b>Ggypsy</b> and <b>Tt</b>raveller pitches or Travelling Showpeople’s or circus people’s sites or plots have to be <b>re-located or re-provided</b> within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. Residents occupying pitches, sites or plots should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved, and replacement accommodation should be secured before relocation takes place.</p> <p>4.14.813 The requirements of H14 are in addition to the duties under <b>Section 124 of the Housing and Planning Act 2016</b>, which require local housing authorities to consider the needs of people residing in or resorting to their district with respect to the provision of both sites on which caravans can be stationed, or places on inland</p>
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		waterways where houseboats can be moored.		
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 suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan.</u></p>		
DR9	Table 10.3	<b>Location</b>	<b>Number of beds</b>	<b>Maximum parking provision*</b>
		Central Activities Zone	<u>All</u>	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	<u>All</u>	Up to 0.25 spaces per dwelling
		Inner London PTAL 2	<u>All</u>	Up to 0.5 spaces per dwelling
		<del>Outer London PTAL 4</del>		
		Outer London Opportunity Areas		
		Inner London PTAL 0 – 1	<u>All</u>	Up to 0.75 spaces per dwelling
		<del>Outer London PTAL 3</del>		
		<u>Outer London PTAL 4</u>	<u>1 – 2</u>	<u>Up to 0.5 - 0.75 spaces per dwelling<sup>+</sup></u>
		<u>Outer London PTAL 4</u>	<u>3+</u>	<u>Up to 0.5 - 0.75 spaces per dwelling<sup>+</sup></u>
		<u>Outer London PTAL 2 – 3</u>	<u>1 – 2</u>	<u>Up to 0.75 spaces per dwelling</u>
		Outer London PTAL 2 – 3	<u>3+</u>	Up to 1 space per dwelling
		<u>Outer London PTAL 0 – 1</u>	<u>1 – 2</u>	<u>Up to 1.5 space per dwelling</u>

		Outer London PTAL 0 – 1	<b>3+</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 <u>Policy T6.1 Residential Parking</u></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</u></b>  <del>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</del></p>		
DR10	Policy T6.3(A)	<p>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></p>		
DR10	Policy T6.3(G) NEW	<p><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></p>		
DR11	Paragraphs 4.1.11 to 4.1.13	<p>4.1.11 <del>Given that London Plan targets have increased significantly from the last London Plan to deliver more of the homes that Londoners need, it is the Mayor's view that the Government's housing delivery test should not unfairly penalise boroughs where housing delivery has been constrained due to factors that are outside their control. For example,</del></p>		

		<p><del>where key allocations or approval sites are expected to make a significant contribution to housing targets but have stalled due to non-planning related reasons, or will come forward later in the 10-year period. Housing completions against the London Plan small sites target are also likely to increase over time, as Policy H2 Small sites is implemented, so this should be taken into account when monitoring housing delivery during the early years of the Plan.</del></p> <p><b>4.1.12</b> If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.</p> <p><b>4.1.123</b> As identified in the Habitats Regulation Assessment, a mitigation strategy for Epping Forest Special Area of Conservation (SAC) is being produced to respond to the impact of additional recreational pressure and air pollution from nearby authorities, including some London boroughs. Should monitoring and evidence demonstrate adverse impacts on the SAC associated with development from London and following the implementation of the mitigation strategy, this will be considered as part of assessing whether a review of the London Plan is required. The GLA will engage with the relevant stakeholders on the formulation and delivery of the mitigation strategy.</p>
DR12	Policy D9 A	<p>A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London <b><u>but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.</u></b></p>
DR12	Policy D9 B 3)	<p>3) Tall buildings should only be developed in locations that are identified <b><u>as suitable</u></b> in Development Plans.</p>
DR12	Paragraph 3.9.3	<p>3.9.3 Tall buildings are generally those that are substantially taller than their surroundings and cause a</p>

		<p>significant change to the skyline. Boroughs should <b>define what is a ‘tall building’ for specific localities, <u>however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This does not mean that all buildings up to this height are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies, by the boroughs in the usual way, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.</u></b> In large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building 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 <b><u>6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. 25m in height in the Thames Policy Area, and over 30m in height elsewhere in London.</u></b></p>
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Direction	London Plan Ref	Tracked change text
DR8	Paragraph 0.0.21	<p>The Plan provides an appropriate spatial strategy that plans for London’s growth in a sustainable way <b><u>and has been found sound by the planning inspectors through the examination in public.</u></b> 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><u>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.</u></b></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 <b><u>plan for no net loss of industrial floorspace capacity and</u></b> set out how industrial land can be</p>

		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.
DR4	Paragraph 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, <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 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. <del>The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.</del>
DR4	Paragraph 2.1.56	Industrial and logistics uses will continue to play a significant role in the area. <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> Belvedere is recognised as having potential as a future District centre.
DR2	Policy D3 (A)	<b>The design-led approach</b>

	and part of (B)	<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 takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies.</u> The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as <u>G</u>gypsy</p>

		and <del>Tr</del> aveller pitches – is the optimum development for the site.
DR12	Policy D9 A	A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London <b><u>but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.</u></b>
DR12	Policy D9 B 3)	3) Tall buildings should only be developed in locations that are identified <b><u>as suitable</u></b> in Development Plans.
DR12	Paragraph 3.9.3	3.9.3 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should <b>define what is a ‘tall building’ for specific localities, <u>however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This does not mean that all buildings up to this height are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies, by the boroughs in the usual way, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.</u></b> In large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building 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 <b><u>6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. 25m in height in the Thames Policy Area, and over 30m in height elsewhere in London.</u></b>
DR11	Paragraphs 4.1.11 to 4.1.13	4.1.11 <del>Given that London Plan targets have increased significantly from the last London Plan to deliver more of the homes that Londoners need, it is the Mayor’s view that the Government’s housing delivery test should not unfairly penalise boroughs where housing delivery has been constrained due to factors that are outside their control. For example,</del>

		<p><del>where key allocations or approval sites are expected to make a significant contribution to housing targets but have stalled due to non-planning related reasons, or will come forward later in the 10-year period. Housing completions against the London Plan small sites target are also likely to increase over time, as Policy H2 Small sites is implemented, so this should be taken into account when monitoring housing delivery during the early years of the Plan.</del></p> <p><b>4.1.12</b> If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.</p> <p><b>4.1.123</b> As identified in the Habitats Regulation Assessment, a mitigation strategy for Epping Forest Special Area of Conservation (SAC) is being produced to respond to the impact of additional recreational pressure and air pollution from nearby authorities, including some London boroughs. Should monitoring and evidence demonstrate adverse impacts on the SAC associated with development from London and following the implementation of the mitigation strategy, this will be considered as part of assessing whether a review of the London Plan is required. The GLA will engage with the relevant stakeholders on the formulation and delivery of the mitigation strategy.</p>
DR3	Paragraphs 4.2.12 and 4.2.13	<p><del><b>4.2.12</b> As demonstrated by the 2017 SHMA, London has significant unmet need for affordable housing. For many boroughs, developments of nine or fewer units are a significant source of housing supply and play an important role in contributing to affordable housing delivery, often via cash in lieu contributions which are then used as part of borough-wide affordable housing programmes. Given the important role these sites play, the Mayor believes that boroughs should be capable of securing cash in lieu contributions for affordable housing contributions from such sites. Therefore, boroughs are encouraged to require affordable housing</del></p>



		<p><del>contributions from developments of nine or fewer units where supported by local evidence.</del></p> <p><del>4.2.13 For practical reasons associated with on-site provision of a small number of affordable units (such as management), affordable housing requirements from developments of nine or fewer units should be asked for as a cash in lieu contribution, rather than as an on-site contribution, and boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development in these instances. Boroughs should have an identified programme through which additional affordable homes will be delivered. Flexibility should be allowed in the timing of payments in recognition of the distinct economics of small and medium-sized housebuilders and to reduce their up-front costs.</del></p>
DR3	Paragraph 4.2.14	Renumber as 4.2.11
DR4	Footnote 59 to paragraph 4.5.7	<p>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. For the purposes of <u>Policy H5 Threshold approach to applications</u>, this floorspace-based approach applies to sites used for utilities infrastructure or land for transport functions that are no longer required, <del>regardless of the provisions of paragraph 6.4.8</del>. However, it is recognised that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available.</p>
DR1	Policy H10 (A)(9)	<del>the need for additional family housing and</del> the role of one and two bed units in freeing up <u>existing</u> family housing.
DR7	Policy H14	<p>A Boroughs should plan to meet the identified need for permanent <del>G</del>ypsy and <del>T</del>raveller pitches and must include ten-year pitch targets in their Development Plan Documents.</p> <p>B <del>As of the start of this Plan period, boroughs should</del></p>

		<p><del>use the following definition of ‘Gypsies and Travellers’ as a basis for assessing need: People with a cultural tradition of nomadism, a nomadic habit of life, or living in a caravan, whatever their race or origin, including:</del></p> <p><del>1) those who are currently travelling or living in a caravan</del></p> <p><del>2) those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation</del></p> <p><del>3) those who, on grounds of their own or their family’s or dependants’ educational or health needs or old age, have ceased to travel temporarily or permanently.</del></p> <p><b>C</b> Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for <b>G</b>ypsy and <b>T</b>raveller 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><b>CD</b> 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><b>DE</b> Boroughs should undertake an audit of existing local authority provided <b>G</b>ypsy and <b>T</b>raveller sites and pitches, working with residents occupying these, identifying:</p> <ol style="list-style-type: none"> <li>1) areas of overcrowding</li> <li>2) areas of potential extra capacity within existing sites</li> <li>3) pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping).</li> </ol> <p><b>EF</b> Boroughs should plan to address issues identified in</p>
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		<p>the audits.</p> <p><b>FG</b> Boroughs should actively plan to protect existing <b>G</b>ypsy and <b>T</b>raveller and Travelling Showpeople or circus people pitch or plot capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.</p>
DR7	<p>Paragraphs 4.14.1 to 4.14.13 including footnote 74</p>	<p><del>4.14.1 Estimates show there are around 30,000 Gypsies and Travellers in London.<sup>74</sup> Their culture and traditions have developed through a nomadic way of life over centuries, and although many Gypsies and Travellers try to maintain this, the lack of pitches on local authority sites often presents a barrier to this. Around 85 per cent of Gypsy and Traveller families in London have been forced to live in housing, or on roadside encampments due to overcrowding, or an unsuitability, or lack of availability of, pitches. The lack of access to secure accommodation and suitable living environments has far-reaching implications for their physical and mental health, welfare, education, employment and access to the wider opportunities London has to offer.</del></p> <p><del><sup>74</sup>: <a href="http://www.londongypsiesandtravellers.org.uk/why-were-needed/">http://www.londongypsiesandtravellers.org.uk/why-were-needed/</a></del></p> <p><del>4.14.2 In this Plan, the Mayor has adopted a new definition for Gypsies and Travellers. This is due to concerns that the existing Government planning definition does not recognise many Gypsies and Travellers, for example:</del></p> <ul style="list-style-type: none"> <li><del>—• Gypsies and Travellers who have ceased to travel permanently due to a lack of available permanent pitches, transit sites or stopping places; frequent enforcement action (evictions); or lack of opportunities and barriers to work</del></li> <li><del>—• Gypsies and Travellers who live in (bricks and mortar) housing due to the lack of sufficient, affordable and good quality caravan site provision; or</del></li> <li><del>—• due to their own or their family's or dependants' educational or health needs or old age. This is most likely to affect Gypsies and Travellers who face multiple and intersecting inequalities (for example older people,</del></li> </ul>

		<p><del>disabled Gypsies and Travellers, women and single parents).</del></p> <p><del>4.14.3 For these groups, it is often very difficult or impossible to demonstrate that they would have immediate plans to travel for work in the future (as required by the current Government planning definition) because there are no viable options or because doing so would have a significant impact on their health, wellbeing and security of income.</del></p> <p><del>4.14.4 This often results in Gypsies and Travellers not being recognised or counted in needs assessments, with many needs assessments identifying zero need. This has a direct impact on the accommodation options available to Gypsies and Travellers and their ability to retain their cultural status and identity, which can lead to greater inequalities in terms of access to safe and secure accommodation, health care and education.</del></p> <p><del>4.14.7 The new definition should be used within London for the purposes of assessing accommodation need, and auditing and protecting existing sites and pitches.</del></p> <p>4.14.19 Boroughs should <b>actively plan for Gypsy and Travellers’ accommodation needs</b>, and should ensure that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.</p> <p>4.14.28 The Mayor will initiate and lead a <b>London-wide Gypsy and Traveller accommodation needs assessment</b>, and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation. Until the findings of this new London-wide needs assessment are available for use in Development Plans boroughs should continue to plan to meet the need for permanent Gypsy and Traveller pitches in accordance with the requirements of Policy H14, with a particular focus on Part <b>BC</b> .</p> <p>4.14.35 Insufficient pitch provision can <b>also</b> lead to a rise in <b>unauthorised encampments</b>, with implications for</p>
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		<p>the health and wellbeing of <b>G</b>ypsy and <b>T</b>ravellers, community cohesion and costs for boroughs.</p> <p>4.14.46 It is acknowledged that, in addition to permanent sites, suitable <b>short-term sites</b> are an important component of the suite of accommodation for <b>G</b>ypsy and <b>T</b>ravellers. Research is currently underway to understand how a ‘negotiated stopping’ approach could work in London as a way of minimising the number of unauthorised encampments.</p> <p>4.14.510 To assist boroughs in meeting identified need, <b>Mayoral funding</b> will be available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches.</p> <p>4.14.611 Where <b>new Gypsy and Traveller pitches</b> are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.</p> <p>4.14.712 If existing <b>G</b>ypsy and <b>T</b>raveller pitches or Travelling Showpeople’s or circus people’s sites or plots have to be <b>re-located or re-provided</b> within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. Residents occupying pitches, sites or plots should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved, and replacement accommodation should be secured before relocation takes place.</p> <p>4.14.813 The requirements of H14 are in addition to the duties under <b>Section 124 of the Housing and Planning Act 2016</b>, which require local housing authorities to consider the needs of people residing in or resorting to their district with respect to the provision of both sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.</p>
DR4	Policy E4(C)	The retention, enhancement and provision of additional

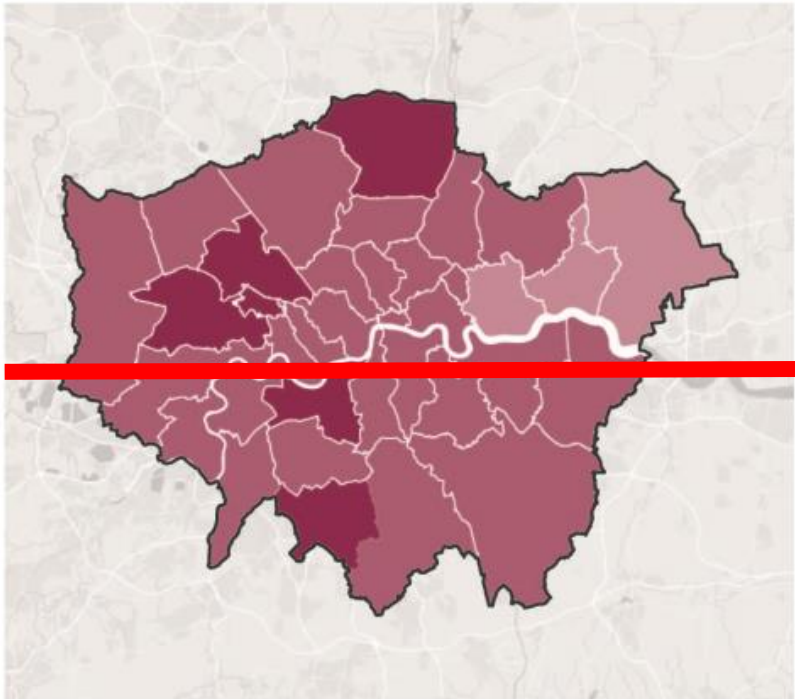
	including footnote 104	<p>industrial capacity across the three categories of industrial land set out in Part B should be planned, monitored and managed, <del>having regard to the industrial property market area and borough level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial<sup>104</sup> 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 <u>Policy E7 Industrial intensification, co-location and substitution</u> <del>and supported by Policy E5 Strategic Industrial Locations (SIL).</del></p> <p><del><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</del></p>
DR4	Paragraph 6.4.5 including footnote 109	<p>Based upon this evidence, this Plan addresses the need to <del>retain provide</del> 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<sup>109</sup> (whichever is the greater).</del></p> <p><del><sup>109</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</del></p>
DR4	Paragraphs 6.4.6 to 6.4.11 including footnote 110	<p><u>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.</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</u></p>

		<p><u>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 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. Boroughs proposing changes through a Local Plan to Green Belt or MOL boundaries (in line with Policy G2 London’s Green Belt and Policy G3 Metropolitan Open Land) to accommodate their London Plan housing target should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land in active employment use. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.</u></p> <p><del>6.4.6 When applying the principle of no net loss of industrial floorspace capacity regard should be given to the characteristics and operational requirements of the different industrial uses set out in Part A. Yard space is an essential requirement for most industrial, logistics and related uses to support servicing, storage and operational needs. Development proposals should ensure that sufficient yard space is provided having regard to the operational requirements of the uses proposed.</del></p> <p><del>6.4.7 Some industrial uses may require a significant amount of yard and servicing space, such as cross-docking facilities. In some instances, this may provide exceptional justification for a plot ratio that is lower than 65 per cent on development for industrial uses only (those listed in Part A of this policy). For this exceptional approach to apply, it should be demonstrated that it is not feasible to achieve no net loss of industrial floorspace capacity through</del></p>
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		<p><del>alternative configurations, multi-storey industrial development, a wider mix of industrial uses, or other appropriate means. This exceptional approach would not apply to industrial developments that are being proposed as part of the processes of SIL / LSIS consolidation and industrial / residential / non-industrial co-location set out in Part B of <u>Policy E7 Industrial intensification, co-location and substitution, including land swaps.</u></del></p> <p><del>6.4.8— Mezzanine space should be excluded from calculations of industrial floorspace capacity. The principle of no net loss of industrial floorspace capacity applies to overall areas of SIL and LSIS, and not necessarily to individual sites within them. The principle of no net loss of floorspace capacity does not apply to sites used for utilities infrastructure or land for transport functions which are no longer required.</del></p> <p><del>6.4.9— Guidance on the approach to be taken to the management of industrial floorspace capacity at borough level and across industrial property market areas is provided in Figure 6.1 and Table 6.2. Boroughs in the ‘Provide Capacity’ category are those where strategic demand for industrial, logistics and related uses is anticipated to be the strongest.<sup>110</sup> They should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water.</del></p> <p><del>Footnote <sup>110</sup> CAG Consulting, London Industrial Land Demand Study, GLA 2017</del></p> <p><del>6.4.10 Boroughs in the ‘Retain’ category should seek to intensify industrial floorspace capacity following the general principle of no net loss across designated SIL and LSIS. All boroughs in the Central Services Area fall within this category in recognition of 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</del></p>
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		<p><del>maintenance), waste management and recycling, and land to support transport functions.</del></p> <p><del>6.4.11 There are three boroughs in the 'Limited Release' category (all in the Thames Gateway) where industrial land vacancy rates are currently well above the London average. These boroughs are encouraged to intensify industrial floorspace capacity, investigate the reasons for high levels of vacancy, take positive steps to bring vacant sites back into industrial use where there is demand and support the re-use of surplus industrial land and floorspace for other uses through a proactive plan-led approach.</del></p>																																																						
DR4	Table 6.2	<p><del>Table 6.2—Management of industrial floorspace capacity—industrial property market area and borough-level categorisations</del></p> <table border="1"> <thead> <tr> <th><del>Property Market Area / Borough</del></th> <th><del>Categorisation</del></th> </tr> </thead> <tbody> <tr> <td><del>Central Services Area</del></td> <td><del>Central Services Area</del></td> </tr> <tr> <td><del>Camden</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>City of London</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Hackney</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Islington</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Kensington &amp; Chelsea</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Lambeth</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Lewisham</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>LLDC</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Southwark</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Tower Hamlets</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Westminster</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td colspan="2"><del>Thames Gateway</del></td> </tr> <tr> <td><del>Barking &amp; Dagenham</del></td> <td><del>Limited release</del></td> </tr> <tr> <td><del>Bexley</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Bromley</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Greenwich</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Havering</del></td> <td><del>Limited release</del></td> </tr> <tr> <td><del>Newham</del></td> <td><del>Limited release</del></td> </tr> <tr> <td><del>Redbridge</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td colspan="2"><del>Lee Valley</del></td> </tr> <tr> <td><del>Enfield</del></td> <td><del>Provide capacity</del></td> </tr> <tr> <td><del>Haringey</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td><del>Waltham Forest</del></td> <td><del>Retain capacity</del></td> </tr> <tr> <td colspan="2"><del>Park Royal/Heathrow</del></td> </tr> <tr> <td><del>Barnet</del></td> <td><del>Retain capacity</del></td> </tr> </tbody> </table>	<del>Property Market Area / Borough</del>	<del>Categorisation</del>	<del>Central Services Area</del>	<del>Central Services Area</del>	<del>Camden</del>	<del>Retain capacity</del>	<del>City of London</del>	<del>Retain capacity</del>	<del>Hackney</del>	<del>Retain capacity</del>	<del>Islington</del>	<del>Retain capacity</del>	<del>Kensington &amp; Chelsea</del>	<del>Retain capacity</del>	<del>Lambeth</del>	<del>Retain capacity</del>	<del>Lewisham</del>	<del>Retain capacity</del>	<del>LLDC</del>	<del>Retain capacity</del>	<del>Southwark</del>	<del>Retain capacity</del>	<del>Tower Hamlets</del>	<del>Retain capacity</del>	<del>Westminster</del>	<del>Retain capacity</del>	<del>Thames Gateway</del>		<del>Barking &amp; Dagenham</del>	<del>Limited release</del>	<del>Bexley</del>	<del>Retain capacity</del>	<del>Bromley</del>	<del>Retain capacity</del>	<del>Greenwich</del>	<del>Retain capacity</del>	<del>Havering</del>	<del>Limited release</del>	<del>Newham</del>	<del>Limited release</del>	<del>Redbridge</del>	<del>Retain capacity</del>	<del>Lee Valley</del>		<del>Enfield</del>	<del>Provide capacity</del>	<del>Haringey</del>	<del>Retain capacity</del>	<del>Waltham Forest</del>	<del>Retain capacity</del>	<del>Park Royal/Heathrow</del>		<del>Barnet</del>	<del>Retain capacity</del>
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DR4	Figure 6.1	<p><b>Figure 6.1 – Management of industrial floorspace capacity – borough level categorisations</b></p>  <p><b>Management of Industrial Floorspace Capacity – Borough Level Categorisations</b></p> <ul style="list-style-type: none"> <li>● Provide Capacity</li> <li>● Retain Capacity</li> <li>● Limited Release</li> </ul> <p>Source: GLA Planning Contains OS data © Crown copyright and database right (2017)</p>																												
DR4	Policy E5(B)(4)	<p><b><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</u></b></p>																												

		<u>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 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>  E
DR4	Policy E7(C)	... 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.
DR4	Policy E7(D)	The processes set out in Parts B and C above must ensure that:  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>  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  <del>3</del> ) the intensified industrial, storage and distribution

		<p>uses are completed in advance of any residential component being occupied</p> <p><b>34)</b> appropriate design mitigation is provided in any residential element to ensure compliance with 1 <del>and 2</del> above with particular consideration given to:</p> <ul style="list-style-type: none"> <li>a) safety and security</li> <li>b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict</li> <li>c) design quality, public realm, visual impact and amenity for residents</li> <li>d) agent of change principles</li> <li>e) vibration and noise</li> <li>f) air quality, including dust, odour and emissions and potential contamination.</li> </ul>
DR4	Paragraph 6.7.2 including Footnote 113	<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>There 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>113</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> <ul style="list-style-type: none"> <li>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</li> <li>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.</li> </ul> <p><del>Footnote <sup>113</sup> See also paragraphs 6.4.5 to 6.4.8 for definition</del></p>

		<del>of industrial floorspace capacity</del>		
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, <b><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></b></p>		
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		Up to 0.25 spaces per dwelling
		Inner London PTAL 2		Up to 0.5 spaces per dwelling
		<del>Outer London PTAL 4</del>		
		Outer London Opportunity Areas		
		Inner London PTAL 0 – 1		Up to 0.75 spaces per dwelling
		<del>Outer London PTAL 3</del>		
		<del>Outer London PTAL 4</del>	<u>1 – 2</u>	<u>Up to 0.5 - 0.75 spaces per dwelling<sup>+</sup></u>
		<del>Outer London PTAL 4</del>	<u>3+</u>	<u>Up to 0.5 - 0.75 spaces per dwelling<sup>+</sup></u>
		<del>Outer London PTAL 2 – 3</del>	<u>1 – 2</u>	<u>Up to 0.75 spaces per dwelling</u>
		Outer London PTAL 2 – 3	<u>3+</u>	Up to 1 space per dwelling
		<del>Outer London PTAL 0 – 1</del>	<u>1 – 2</u>	<u>Up to 1.5 space per dwelling</u>
		Outer London PTAL 0 – 1	<u>3+</u>	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 <u>Policy T6.1 Residential Parking</u></p> <p><u><b>+ When considering development proposals that are higher density or in more accessible locations, the lower standard shown here should be applied as a maximum.</b></u></p> <p><u><b>^ Boroughs should consider standards that allow for higher levels of provision where there is clear evidence that this would support additional family housing</b></u>  <del><b>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</b></del></p>		

		<b><u>spaces per unit</u></b>
DR10	Policy T6.3(A)	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>

#### Other non-material changes to the Intend to Publish London Plan

London Plan (Intend to Publish) Ref	Change
Contributors Credits GLA Planning	Added additional names
Table of Contents	Page numbers updated as appropriate
Paragraph 0.0.1	Updated to reflect process stage
Paragraph 0.0.5	Corrected "section" to lower case in footnote 3
Paragraph 0.0.6	Corrected "section" to lower case
Paragraph 0.0.20	Updated the web link to the evidence base in footnote 4
Policy GG3	Full stop added at the end part I
Figure 2.1 Key Diagram	In the key, the labels for the following Opportunity Area groupings are amended to match the labels in Figures 2.7, 2.8 and 2.12 of the Plan. Including: <ul style="list-style-type: none"> <li>• "OAs Thames Gateway" amended to read "OAs Thames Estuary North and South"</li> <li>• "OAs Thameslink/High Speed 2" amended to read "OAs High Speed 2 / Thameslink"</li> <li>• "OAs London Trams" amended to read "OAs Trams Triangle"</li> </ul>
Figure 2.7 Thames Estuary	Superfluous "/" deleted after "6,000" under the

London Plan (Intend to Publish) Ref	Change
	Bexley Riverside OA housing figure
Policy SD4	Full stop added at the end part N 2)
Figure 2.17	Kings Road (east) Major town centre symbol added to diagram for consistency with Annex 1, Table A1.1
Policy SD10	Full stop added at the end part B 3)
Policy D1	Full stop added at the end part A 12)
Policy D8	Full stop only at end of policy
Paragraph 3.13.4	Reference to Policy T7 uses earlier policy title “Freight and servicing” updated to “Deliveries, servicing and construction”
Paragraph 3.13.11	Reference changed from Policy D13 to Policy D14
Paragraph 4.1.9	Use Class capitalised as referring to specific use class
Paragraphs 4.1.12 – 4.2.13	Renumbered as 4.1.11 – 4.2.12
Paragraph 4.2.1	Brackets added around the wording 'below 0.25 hectares in size' for consistency with Policy H2
Paragraphs 4.2.4 – 4.2.11	Renumbered as 4.2.3 – 4.2.10
Paragraph 4.2.14	Renumbered as 4.2.11
Policy H5	Full stop added at the end part E
Paragraph 4.5.11	The date range for the Mayor’s Homes for Londoners Affordable Homes Programme amended to read: “2016-2023”
Footnote 60 to paragraph 4.5.11	Hyperlink amended to the Mayor’s Homes for Londoners Affordable Homes Programme
Policy H6 A 1)	Reference to low-cost rent hyphenated
Paragraph 4.6.1	Reference to low-cost rent hyphenated
Paragraph 4.6.4	The dates “2016-2021” are deleted as funding guidance relates to more than one programme. Additional footnote “61” added
New Footnote 61	New footnote and hyperlink added to the Mayor’s Homes for Londoners Affordable Homes Programme
Paragraph 4.9.1	Two commas added, one full stop removed, and the word ‘that’ added to the final sentence.
Paragraph 4.9.3	Corrected "section" to lower case in footnote 65
Policy H11	In part B8, comma changed to a full stop. The word “that” added to the second clause.
Paragraph 4.11.10	Reference to Part A moved to appear before the policy reference. Reference to low-cost rent hyphenated



<b>London Plan (Intend to Publish) Ref</b>	<b>Change</b>
Policy H13	Comma inserted before “minibuses” in Part B5.
Paragraph 4.13.6	Comma inserted after “In addition to this”
Paragraph 4.13.6 i. a.	Space deleted before “agreements”
Policy H14	The word “traveller” in the policy title is uncapitalised for consistency with Direction DR7
Table 4.4	Reference to “gypsy and traveller” in the first part of the title is uncapitalised for consistency with Direction DR7
Footnote 75 to Table 4.4	Footnote reference amended for clarity and hyperlink added
Footnote 81 to Policy H16 A	Reference to “use class” after “sui generis” deleted for consistency.
Footnote 82 to Paragraph 5.2.1	Broken hyperlink replaced
Policy S3 A 1)	Full stop deleted at the end Policy S3 part A 1)
Policy S3 B 9)	Full stop added at the end Policy S3 part B 9)
Policy S5 A 3)	Full stop added at the end Policy S5 part A 3)
Paragraph 6.2.4	Hyphen added to phrase “back-of town centre” to read: “back-of-town centre”
Policy E10 F	Hyphen added to “strategically-important”
Paragraph 6.10.4	Text “also see” amended to “see also”
Paragraph 7.3.3	Full stop added at end of paragraph, 2 <sup>nd</sup> bullet
Policy G1 A	Comma inserted after "environment" in first sentence of Policy G1 A
Figure 8.2	Words “database right (2018)” added to the data provenance
Footnote 147 to Policy SI 1	Replace “Guidance is currently in ‘The control of dust and emissions for construction and demolition SPG’” with “The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance, Mayor of London, 2014”
Footnote 148 to paragraph 9.1.3	Brackets added
Footnote 149 to paragraph 9.1.4	Text tidied up and hyperlink added
Paragraph 9.1.11	Word “most” changed to “greatest” to align with Intend to Publish <u>tracked</u> version
Paragraph 9.1.11	The "s" deleted at the end of "Assessments", so that it reads "Assessment"
Footnote 157 to paragraph 9.2.12	The word “Construction” is capitalised
Paragraph 9.2.12, clause m	One of the two full stops at the end of clause m deleted

London Plan (Intend to Publish) Ref	Change
Figure 9.4	In the key, the words “of the London Plan (draft December 2017)” are deleted so the text reads: “This Figure must be used in conjunction with paragraph 9.5.14”
Policy SI 6 A1)	The text abbreviation for Gigabyte is capitalised “GB”
Policy SI 8 D4)	Full stop added at the end of part D4)
Paragraph 9.8.13	Comma added and the word “and” deleted in the first line
Figure 10.1	The word “mode” added before “share” in the Figure title
Figure 10.2	The word “ten” changed to lower case in the Figure title
Table 10.1	Updated Elizabeth line date range to reflect new timescales: “2021” changed to “2022”
Table 10.1	Full stop removed after “London Underground step-free stations and more accessible vehicles”
Table 10.1	Removed superfluous “etc” from London Underground upgrades line
Table 10.1	Changed “Programme” to lowercase on Thameslink line for consistency
Policy T4 B	The words “or Mayoral” added after “Transport for London” to clarify that guidance could be Mayoral or Transport for London
Table 10.2	The first letter of “Hospitals” changed to lower case for consistency
Table 10.2	The first letter of “Thereafter” changed to lower case in the C3-C4 line
Table 10.2	The first letter of “Nurseries” changed to lower case
Table 10.2	Removed superfluous “etc” from D1 and D2 lines (three in total)
Paragraph 10.5.3	Deleted the word “their”
Paragraph 10.5.8	The word “messengers” replaced with the word “couriers” as the latter term is used more in common parlance
Paragraph 10.6.21	The word “is” changed to “it”
Paragraph 10.6.22	The letter “s” deleted after “hotel”
Table 10.4	“m2” changed to “sq.m.”
Policy T7 D	Changed the first letter of the four bullet points to lower case for consistency

London Plan (Intend to Publish) Ref	Change
Policy T7 D	Corrected the spelling of the word “alternate” to “alternative”
Footnote 189 to paragraph 11.1.12	Full title of the Arup paper added and hyperlink embedded in source reference
Paragraph 11.1.30	The first letter of “table” changed to upper case
Footnote 193 to paragraph 11.1.35	Hyperlink to document embedded within source reference
Table 12.1	Numbering added to KPI references KPI 1 to KPI 12
Annex 1 – Commercial Growth Potential	Reference “A, B, D and SG Use Classes” changed to “A, B and D Use Classes and sui generis”
Annex 1 – Footnote A1	Broken hyperlink replaced
Figure A1.4	Key re-aligned so text not partially obscured
Annex 1 – Footnote A2	Hyperlink corrected
Glossary	Under the entry “Affordable commercial and shop units”, the word “Use Class” is capitalised
Glossary	Glossary items in “G” re-ordered into alphabetical order
Glossary	Reference added: “J No entries”
Glossary	Hyphen added to “Strategically-Important Landmarks”
Glossary	Reference added: “X No entries”
Glossary	Reference added: “Y No entries”
Various as relevant	Change references “Section” to “section” (in relation to named legislation) whilst retain capitalisation for Section 106 agreements and Section 73 applications.
Various as relevant	Change “short term” to “short-term” Change “medium term” to “medium-term” Change “long term” to “long-term”
Various as relevant	Changed references to “sqm” to “sq.m.”
Various as relevant	References to “sui generis” changed to lower case. Reference to “use class” after “sui generis” or “SG” deleted for consistency
Various as relevant	Footnotes re-numbered following the addition of new footnote 61 and deletion of former footnotes 75, 104, 109, 110 and 113