

# Allies and Morrison comments

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [1.0.9](#)

Allies and Morrison LLP would like to express its strong support for the ambitious direction the new London Plan represents. We consider the draft plan represents an important step change in how growth and resilience in London is steered and managed. We support the principles that underpin the Mayor's 'good growth' agenda, particularly Policy GG3 that aims towards a healthier, more affordable and more accessible city increasingly organised around walking, cycling and public transportation. Policies GG2 / GG4 / GG5 which will optimise land use through intensification of densities, co-location and mixed-use developments that will strengthen the role of town centres as focal points for housing, employment, community facilities and services. Policies GG1 / GG6 which will create attractive, inclusive, resilient and integrated places across London. We would like to express our gratitude to the Mayor and GLA team in making a series of bold moves in the plan, most significantly inputting design and place-making at the heart of the plan.

Page: [Policy SD1 Opportunity Areas](#)

Section: [N/A](#)

We support the proposed investment in new sustainable transport infrastructure to support growth areas.

Page: [Bakerloo Line extension](#)

Section: [2.1.12](#)

We are pleased to see that the Mayor is proposing to extend the Bakerloo Line to increase the capacity and connectivity of the transport network.

Page: [Crossrail 2](#)

Section: [2.1.19](#)

We are pleased that the Mayor is continuing to support the Crossrail 2 project to support London's major growth locations with potential strategic growth locations outside London.

Page: [Thames Estuary](#)

Section: [2.1.41](#)

We are pleased that Mayor will prioritise the exploration of a number of schemes that will encourage growth and connectivity across the river Thames including: the Silvertown tunnel, Rotherhithe and Canary Wharf river crossings, extension of the DLR across the river from Gallions Reach to Thamesmead and Overground crossing from Barking Riverside to Abbey Wood.

Page: [Policy SD2 Collaboration in the Wider South East](#)

Section: [SD2](#)

We welcome joint working with Wider South-east partners to ensure that plan-making is, as far as possible, informed by consistent technical evidence.

Page: [Policy SD8 Town centres: development principles and Development Plan Documents](#)

Section: [SD8](#)

Object - With reference to Part B 4 h:

We generally agree with the approach taken in Policy SD8, however, the London Plan could be more explicit in its support of heritage assets and in communicating the value and role of these assets within local plan making. More broadly, we believe that the theme of heritage should feature more prominently across the London Plan. We see this as a crucial ingredient in accommodating 'good growth' across London's town centres that is not at the expense of their distinct local and historical character and identity.

Page: [Policy D2 Delivering good design](#)

Section: [D2](#)

Object - We generally support Policy D2:H Maintaining Design Quality (Point 3) . In particular point 3.2.9, which notes that the assessment of large elements including building facades should be undertaken during planning rather than deferred for consideration after the granting of planning.

The point may be more effective if it requires facade study drawings of a specific scale (e.g. 1:50) to be submitted at planning application stage and all visible facade materials to be defined / described on the drawings submitted.

Page: [Policy D2 Delivering good design](#)

Section: [D2](#)

We support Policy D2: H Maintaining Design Quality (Point 4). We also support the related point 3.2.10 which notes that planning authorities should consider securing the design team's ongoing involvement as a condition of planning permission, or as a design reviewer where this is not possible.

We think that this is a positive contribution towards maintaining design quality through to the completed building.

This is a very important policy which we support.

Page: [Policy D3 Inclusive design](#)

Section: [D3](#)

We support Policy D3: A (Point 3) and the related point which notes the requirement that, where lifts are provided they should be fire evacuation lifts.

Page: [Policy D4 Housing quality and standards](#)

Section: [N/A](#)

We generally support Policy D4: D (Points 1-7) which sets minimum standards for internal private space.

However, we suggest that it should solely refer to the current version of the NDSS as the definitive set of requirements to avoid any discrepancies due to updates of that document that may occur after publication of the London Plan.

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.12](#)

We support this point which notes that, by careful design, buildings can be placed closer together than might otherwise have been achieved.

This could assist in achieving higher numbers of units on valuable development sites.

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.12](#)

An updated SPG would be very useful, especially if it covers a comprehensive set of parameters covering quantifiable design issues.

Page: [Policy D4 Housing quality and standards](#)

Section: [D4](#)

We generally support Policy D4: E.

We suggest changing the words 'normally' avoid to 'minimise'.

Policy D4 (Private Outdoor Space – Points 9 & 10 and para 3.4.6)

*Current policy wording: Private outside space*

*9) A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1.*

*10) The minimum depth and width for all balconies and other private external spaces should be 1.5m.*

This policy, while clearly well intentioned (and difficult to argue with in respect of the enhanced amenity it offers residents) does nevertheless pose a major challenge to the protection, and evolution, of London's unique urban character.

For this reason, we believe, it should be reconsidered.

The policy (which was first defined within the Mayor's Housing Design Guide and has therefore been in force for some time) requires all flats, on all floors, in all locations - whether in the heart of the city or on its periphery, whether in town centres or on park edges, whether overlooking streets and lanes, or trunk roads and by-passes, whether in a four storey block or a tower, whether on the front of a building or the back, whether above shops and restaurants or over offices and workshops - to have the same balcony with the same minimum total area and, almost inevitably - because of the associated minimum depth requirement - the same shape on plan.

The effect of this has been to impose an enormous constraint on the evolution of housing design in London, narrowing the range of architectural expression and form. It is also, arguably, the primary factor that has given rise to the widely held impression that all new housing in London tends to follow a generic pattern, regardless of situation or context.

This universalising tendency is particularly problematic in areas where maintaining continuity with existing urban fabric is seen as important: London does not, by and large, have a tradition of balconies, and there are few areas of the city where balconies form a key component of a local, historic character.

But more than this, what the policy has done is to reduce the communicative and expressive power of the resulting architecture. It has, for example, made it increasingly difficult to articulate the difference between the front and back, or front and side of a building, in order to be able to respond appropriately to an existing, or proposed, urban hierarchy. It has made it harder to register a distinction in the façade of a building between the bottom, middle and top. It has made it harder to give status to the location of front doors, harder to negotiate subtle issues of privacy and overlooking, and harder to respond sensitively to the wide range of urban conditions and relationships that each individual project has to deal with.

Finally, by focusing entirely on the balcony as the sole, policy-compliant method of relating the interior of a flat to the exterior, it reduces the likelihood of other devices – in particular the Juliet balcony – being deployed. This is unfortunate as the Juliet balcony not only has a long urban history, but is also very well-suited to the requirements of contemporary housing: cleaning French windows can be carried out easily, and safely, by residents, thereby reducing service charges; the lack of a projection avoids any loss of daylight to the flat below; noise disturbance between adjacent flats is minimised; generous ventilation, or trickle ventilation, can be provided easily and safely; sun shading can be introduced at the top of a window while maintaining daylight at lower levels.



We would therefore like to suggest that this policy be amended in future to allow designers greater flexibility in the way they satisfy the London Plan's fundamental objectives, the creation of better homes and a better urban environment.

Methods for achieving this might include any or all of the following:

1. Accepting a minimum percentage compliance with the policy of, say, 90%, as opposed to the 100% that is now required.
2. Accepting the provision of Juliet balconies, potentially in more than one location, as an alternative method of satisfying the policy, on the basis that additional space is provided within the flat equivalent to the size of the required balcony.
3. Lifting the requirement to provide balconies where buildings face onto exceptionally busy roads.

Given that the policy has already been in place for some years, and to inform this change in policy, it would also be helpful to undertake research into how well balconies work, who uses them, for what purpose and at what times of the year.

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.2](#)

We support Policy D4 (Point 3.4.2)

This point calls for boroughs to resist dwellings with floor areas significantly above the NDSS.

This is a significant change in planning thinking and recognises the need to maximise density across all sites.

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.5](#)

We support this point as it provides helpful clarification of requirements.

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.9](#)

This is a helpful clarification. We believe that, in high density areas of the city, creating appropriate external communal space for residents within developments, as appropriate, does provide a valuable amenity.

Page: [Policy D6 Optimising housing density](#)

Section: [D6](#)

Policy D6: A

We strongly support the requirement that notes: "Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused." This can help to achieve the appropriate increase in density which is a prime objective on sites in London.

We would suggest a strengthening of the policy wording to ensure that optimal density is demonstrably informed by context. Our research for Historic England, referenced in the draft London Plan in Figure 7.4 highlighted the importance of local character in defining appropriate levels of intensification.

We would suggest the following amendment:

A - Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

1) the site context **(including its history, character and wider setting)**

2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)

3) the capacity of surrounding infrastructure.

We support the removal of the residential density matrix, but would caution that without clear emphasis on local character over-densification of areas could follow to the detriment of London's diverse character.

Page: [Policy D6 Optimising housing density](#)

Section: [3.6.9](#)

We would suggest the London Plan could go further in resolving the discrepancies in how density is measured. Whilst we support the inclusion of a wider range of density measurements, in particular FAR, we would strongly recommend that the London Plan defines how site boundaries should be drawn for the purposes of measuring density. This would save a huge amount of time on the part of both planning officers and applicants who often waste time debating densities due to differing boundaries. If a standard approach was set out in the London Plan this would give much greater clarity to both sides.

Page: [Policy D8 Tall buildings](#)

Section: [D8](#)

Policy D8: B

We have concerns that getting boroughs to identify locations for tall buildings may have unintended consequences. Once a location has been identified as appropriate for tall buildings, there is less incentive for a developer to strive for the highest quality design. Where no “appropriateness” has been identified, there is instead a great onus on a developer to present the very best design so as to fulfil the case for an exception. We would advise against making boroughs identify locations for this reason.

Page: [Policy D8 Tall buildings](#)

Section: [D8](#)

Policy D8 :D

We think that this sort of public access to tall buildings is totally unnecessary and a waste of resources except in exceptional circumstances.

Page: [Policy H2 Small sites](#)

Section: [H2](#)

Policy H2 :G

We support this point as it adds clarity.

Page: [Policy H2 Small sites](#)

Section: [4.2.6](#)

H2 - Object, we have great concern because disabled people may want to live on a small site, and this limits choice.

Page: [Policy H6 Threshold approach to applications](#)

Section: [H6](#)

Policy H6: B & C

We support the objectives noted and the clarification the points give.

Page: [Policy H12 Housing size mix](#)

Section: [4.12.3](#)

We support this clarification that two bed units could be considered as family units.

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Page: [Policy H13 Build to Rent](#)

Section: [H13](#)

Policy H13 : C

We support this policy. This Fast Track Route option possibly creates some more certainty to progress through planning.

Page: [Policy H13 Build to Rent](#)

Section: [4.13.4](#)

We support this clarification.

We support the recognition of the need for affordable workspace in London, but would suggest that Policy E3 needs to go further, and be supported by wider moves to establish the provision of affordable workspace in a similar manner to which affordable housing is prioritised and enabled. Alongside the loss of industrial floorspace, London has also seen rising industrial rents, with lower cost spaces being pushed further and further out of London. In order to maintain a diverse and sustainable economy London cannot risk the loss of affordable workspace. The intensification of industrial sites advocated in Policy E7 is likely to exacerbate this issue, forcing rents up in order to fund the redevelopment of these sites.

We would suggest at a minimum:

1. Planning obligations **should** be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:...
1. Boroughs, in their Development Plans, **should develop** more detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace.



Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [N/A](#)

We support the general shift in policy giving greater protection to industrial land and industrial activities as part of the London economy. As a practice we have been closely involved on a number of major industrial sites - both in shaping planning policy in opportunity areas and in creating innovative solutions for intensification on individual sites coming forward for development. We would also support greater recognition for the 36% of industrial areas that are not protected by SIL or LSIS designation.

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [6.4.6](#)

The borough classification provides a useful steer for the general policy. In practice, a more granular approach will be needed than borough by borough, particularly since values and therefore potential for intensification/multi-storey operation will be very different in different parts of London.

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [Table 6.2](#)

The borough classification provides a useful steer for the general policy. In practice, a more granular approach will be needed than borough by borough, particularly since values and therefore potential for intensification/multi-storey operation will be very different in different parts of London.

Page: [Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function](#)

Section: [E7](#)

We welcome the requirement for innovative solutions. In practice, there will need to be differentiation between those sites where the intention is to intensify industrial activities (and whether alongside this any other uses can be included) and those sites where the intention is to maintain existing floorspace and add residential.

There is a real need for a much more nuanced appreciation of employment uses generally. The national, and by extension the London Region, definition and categorisation of residential uses has rightly developed many layers to recognise of different housing types, sizes and tenures, as well as very specific design considerations relating to housing. The same is needed for employment uses. This is particularly important when considering co-locating industrial uses with residential. Industrial uses range from those which require 24/7 access and operation and often involve noisy or polluting activities through to those that are much easier neighbours for residential uses. Whilst it is true that some industrial uses can be moved to outer parts of London, there are many industrial activities which need to be much more central. As such, planning policy must find a way to better recognise the locational needs of different industrial activities and to differentiate between those that can sit under or next to residential uses and those that need separation. Whilst we recognise the responsibility for a more nuanced land use class order rests at national government level, we would urge the Mayor and the London Plan to do all in their scope to advance this agenda.

At the same time, it is important to recognise that the multi-storey, co-located model cannot be a general solution, not least because the economics of intensifying industrial land vary. Good design is essential for co-location models, to ensure industrial businesses are able to operate unhindered and safely near housing.

London is defined by its river. It is the reason for its existence and the backdrop for two millennia of its history. At low tide, it reveals our city's largest public open space, a meandering shingle path that both divides and unites our capital. It was London's neglected back door until we rightly developed our Canalettoesque concern. And today, the walk on London's south bank from Greenwich to Battersea has made the river one of Europe's major urban spaces – both compellingly popular and attracting some of London's most important cultural destinations.

Characterised by its buildings, the river and its setting is arguably the capital's most valuable spatial asset. As a space, its significance is beyond measure: without it, London would not be the extraordinarily memorable place it is. This unquestioned value is threatened by London's pressing need to develop. The relentless exploitative pressure on sites near the river has not been matched by a policy or organisation capable of managing such change.

The new draft London Plan recognises the absence of a strategy for the central section of the River Thames. The Wandsworth to Bermondsey Thames Policy Area is the only section without a strategy, and the stretch which is in most urgent need for one.

The recently established Thames and London Waterways Forum represents a step forward in addressing priority issues related to the River Thames. However, this Forum does not have sufficient scope of remit or independent custodian role to address the large gap which exists.

The Mayor and the London Plan need to first appropriately reflect the significance of the River Thames to London's enduring character and attraction. The importance of the central section of the river cannot be overstated. It is one of the most significant spaces in one of the most important cities in the world. There is a need to define the significance of the River Thames and to develop policies which are appropriate to its management.

Secondly, a statutory custodian of this stretch of the River Thames must be agreed. This custodian should be an independent body that can act as a statutory consultee on all planning applications close to the Thames.

This custodian would test applications against a set of principles which, might include “the closer to the river, the more one has to contribute to it”.

Establishing a statutory custodian could be achieved in one of two ways:

1. Protecting the central section as a listed structure - Technically it would be possible to list this section of the river. Much of the river bank is man-made and therefore listable as a built structure. This approach would give Historic England the role of statutory custodian.
2. Establishing a new independent organisation, separate to GLA, TfL and the Port of London Authority, with the statutory powers to manage change along the riverside. Its remit would include coordinating the views of all the political authorities, conserving the river's history and ensuring that new development understood, addressed and reinforced the character of the river rather than simply exploiting it. Such an authority would fill a yawning gap in the armory of London's conservation.