

Dear London Plan Team,

Introduction and Overview

The London Sustainable Development Commission (LSDC) provides independent advice to the Mayor to embed sustainability into London wide strategies and policies. The commission includes individuals with a diverse range of knowledge and expertise relating to sustainable development from London's economic, social, and environmental sectors. (further details in appendix 1)

The commission has been involved in several previous iterations of the London Plan, including participation at Examination. Since its inception in 2002, the LSDC has advised the Mayor of London on a wide range of issues and has undertaken extensive research into the critical issues facing London today.

The LSDC welcomes this opportunity to comment on the Draft New London Plan. The LSDC also recognises and welcomes the substantive work undertaken during this revision to the London Plan. Direct discussions with the London Plan team have highlighted to the commission that significant effort has gone into reviewing areas supported by the LSDC.

The commission is strongly supportive of the Draft New London Plan and recognises the scale and complexity of the challenge the Plan is seeking to address. The scale of projected population growth, the housing crisis and the consequent pressure on land needs to be set in the context of limited environmental capacity coupled with problems such as air pollution and the impacts of climate change. We welcome the clear message that it is not about growth at any cost and the firm commitment in the Plan to address the challenge in a way that is environmentally and socially sustainable as expressed in the concept of Good Growth.

The LSDC strongly supports the fact that many of the environmental policies have been strengthened and are pleased to note that many of the areas that the commission considers to be critical to the future of London are given prominence in the Plan. The ambitions expressed in the Plan for London to become a zero waste city and a zero carbon city are particularly welcomed. Considerable work has been undertaken on the delivery of sustainable infrastructure and this is reflected in the prominence given to this in the Plan. We also welcome the high profile given to green infrastructure and ambitions for London to be 50% green by 2050.

The response focuses on key areas that the LSDC would like to support as well as areas where the commission considers that the Plan could be strengthened. The commission would welcome

the opportunity to work with the London Plan team and contribute further as the Plan is developed and considered at Examination.

The LSDC response focuses on the following topics, drawing together the following strategic themes for further discussion in relation to the future sustainable development of London:

- **Sustainability as a defining objective** – there is a need to set a clearer and more ambitious vision for London as a sustainable city. A more integrated systems approach to the design, construction, operation, maintenance and through-life development of new infrastructure should be advocated for areas of major change and development.
- **Economic Vision and Defining Good Growth** – the Plan needs to more explicitly set out the strong link between London’s environmental performance, urban form and economic prosperity. Too often investment in green measures is seen as a negative cost. A strong vision and positive framing of the economic opportunities associated with sustainable growth is vital to attracting investment in London’s assets.
- **Developing the CleanTech economy** – time is short if London is to establish itself as a global leader in creating new CleanTech businesses. The London Plan has a key role in supporting these industries and facilitating the development of clusters in key locations such as Old Oak and Park Royal so that this opportunity is not missed.
- **Zero Carbon** – the policies of the London Plan need to be strengthened if the target of becoming a zero carbon city by 2050 is to be met. This includes an understanding to how heat networks in London will decarbonise, further guidance on the use of carbon offset funds, the inclusion of carbon reduction targets for smaller sites and the inclusion of requirements to reduce embodied carbon in construction materials.
- **Housing** – the Plan has a strong emphasis on housing delivery which the commission supports. However, there is concern about the emphasis on small sites may have unintended negative consequences, including loss of open space, intensification leading to loss of family units and the loss of employment/industrial space. It is also considered that the Plan should do more to support and encourage the delivery of family housing.
- **Integrated approach** – it is considered that the Plan could do more to encourage and highlight the benefits of an integrated approach to the design of development and infrastructure in key areas of change and the importance of future proofing London’s infrastructure against future change.
- **Opportunity Areas** – as the key areas of development and change in London where there is an opportunity for a comprehensive planning approach, it is considered that much clearer and more ambitious sustainability targets should be set, including for example carbon reduction, renewable energy, green infrastructure and net environmental gain.

The London Plan and Sustainable Development

The planning system has a vital role to play in successful place-making and delivering sustainable development. This response focuses on the spatial and land-use planning mechanisms that are needed to achieve high quality, sustainable development and in particular what the London Plan should do as a strategic planning document for London. However, it is recognised that the London Plan forms one element in the wide range of strategies, programmes and initiatives that the Mayor is promoting and leading.

The LSDC will continue to engage with the Mayor more widely in developing these strategies and continue to lobby Government to secure the investment and develop the necessary fiscal and legislative tools, including successful devolvement of powers, required to achieve the

Mayor's vision for London as a sustainable city. And specifically, in terms of investment and funding the Plan, the LSDC is currently undertaking a piece of work dedicated to understanding how to finance the transition to a zero carbon, sustainable London. The commission looks forward to sharing the outcomes and recommendations of this work with the London Plan team upon its completion.

The three 'pillars' of sustainability, which include social, economic and environmental considerations, should each contribute to an integrated vision for London's future growth. As set out in a number of publications by the LSDC, sustainable development is underpinned by quality of life indicators, particularly in that it is *"concerned with whether the environmental, social and economic systems in a community are providing its citizens, both now and in the future, with the opportunity to lead a good quality of life."*¹ The three pillars of sustainability and quality of life indicators tie together the key objectives for achieving sustainable development. As such, the Plan should provide a clear vision for a genuinely sustainable city, setting out clearly how these differing strands of sustainability feed into the overarching objectives for the future growth of London.

The Plan should provide a clear economic framing of sustainability, building on existing research and evidence which demonstrates how 'green' agendas, economic growth and social objectives are not in conflict, but in fact positively reinforce and support one another. The role of sustainability and green agendas and technology should be framed as significant opportunities to achieve a whole range of policy objectives, as opposed to challenges that might constrain or limit growth over the Plan period. Equally, the Plan should have a clear vision on social inclusivity as an integral element of sustainable development.

With this in mind, the London Plan should draw upon this opportunity to provide a genuine strategy to link up all the environment, social and economic objectives for the city.

1. Sustainability as the Central Objective

The concept of Good Growth indicates a clear ambition for sustainable development to underpin the whole of the Plan, which the commission strongly supports. The LSDC supports and welcomes a great deal of the policies and content of the Sustainable Infrastructure chapter in particular. However, the commission is concerned that the ambition will not be realised unless sustainability is addressed in a more integrated way throughout the Plan and a number of key policies are strengthened as outlined below.

First, the commission is concerned that the Plan does not present a clear vision of London as a genuinely sustainable city. Putting the vision to the fore will allow for an increased level of ambition that the commission feels is needed. Sustainability should be more explicitly integrated into the definition of 'Good Growth' as the organising principle which underpins these overarching policies. It then needs to be clear how these principles are delivered through the policies of the Plan. As set out in Section 13 of this response, the London Plan needs to be monitored against the Sustainable Development Goals as part of Annual Monitoring Report (AMR) to be published by the Mayor each Spring. The LSDC is willing to work with the GLA to embed these monitoring requirements within the AMRs.

¹ London's Quality of Life Indicators Report 2017: Measuring London's progress towards becoming a sustainable world City, LSDC, p. 11

The commission considers that the Plan does not properly integrate sustainable development as an imperative which cuts across all themes of the Plan. For example, the principles of GG6 Increasing Efficiency and Resilience are primarily dealt with under the Sustainable Infrastructure Chapter but are hardly referenced in design, housing or economy.

The commission has a strong view that the Plan would be much more effective and coherent if sustainability requirements were picked up and enforced throughout the Plan, rather than the current structure which attempts to address sustainability in a single chapter (Sustainable Infrastructure). As a minimum, there is a need for a much clearer and more explicit section at the start of the plan which makes clear that sustainable development is the linking element across all the objectives and ambitions of the Plan. This should be expressed in policy rather than supporting text. The LSDC is willing to work with the GLA to develop this section.

One of the most significant problems that illustrates the lack of integration is the paucity of references to sustainable design in the Design Chapter. Design is the crucial opportunity for influencing much of the sustainable elements of a development and there is a risk that the current approach undermines the ambition for sustainable development to underpin the whole Plan. In particular, Policy D1B(3) needs to be strengthened to give much greater prominence to the need to meet high sustainability standards. The commission considers that the design policies are very strong on inclusive design but would suggest that a similar approach should be taken to sustainable design, with the inclusion of a specific policy and further references throughout the Design Chapter.

Linked to this, the Plan should do more to emphasise the importance of an integrated approach to design of development and infrastructure, particularly in areas of major development and change such as the Opportunity Areas. The commission would like to see a greater emphasis in the Plan on the opportunities that integrated solutions which recognise the multi-functionality of infrastructure can bring. This is a point that should be picked up in the Good Growth policies (GG2 and GG6) as well as in the Sustainable Infrastructure policies.

In addition, the commission considers that there needs to be significant strengthening of a number of key policies if the ambitions of the Plan are to be realised.

- **Decarbonisation** - GG6, should set a much stronger commitment to decarbonisation, in line with Mayoral ambition, which would set the benchmark for later policies. Policy requirements should also be strengthened in relation to Opportunity Areas. Given the scale and importance of some of these schemes, there is a justification for them to have much higher sustainable development requirements. This should be made clear in Policy SD1 and picked up in the supporting text relating to specific Opportunity Areas.
- **Smaller sites** - The commission also has a significant concern about the lack of defined standards for smaller sites, particularly given the emphasis in the Plan on the significant contribution that smaller sites should make to meeting overall housing targets. The commission considers that the Plan should give a much clearer steer to Boroughs in the form of a policy setting out when an energy strategy should be required and what it should contain, including benchmark standards. Without this, there is a concern that a significant proportion of development will fall short of the standard required to achieve the zero carbon target.
- **Housing** - The commission recognises the acute need to deliver more housing and supports the Plan's focus on housing delivery. However, the push for delivery of higher housing numbers must not be at the expense of sustainability standards. There is a clear risk that sustainability performance functionalities are likely to be 'value engineered' out from a cost cutting perspective, given the range of competing

priorities and costs on development. This is picked up to a certain extent in supporting text to Policy H5 (Para 4.5.4) but this point needs to be made more explicitly and clearly. A clear statement is required regarding the priority to be given to ensuring that new homes and commercial buildings will perform to high sustainability standards.

- **Sustainable design** - The commission is concerned that the Plan should state more clearly that design quality including sustainable design standards should be considered over the long term beyond completion to ensure that buildings are performing as intended at design stage. This should be picked up in Policy D2 (H) and supporting text.

Recommendations:

- Include stronger narrative on the cross-cutting nature of sustainable development to articulate how sustainability links across all the elements and objectives of the Plan.
- Ensuring that the LP's statutory Annual Monitoring Report includes monitoring and reporting against the SDGs.
- Include diagram in each Chapter to explain how the Chapter delivers against the Good Growth objectives.
- Additional sustainable design policy in the Design Chapter and integration of sustainable development requirements in Policies D1 and D4.
- Strengthen reference in D1B3 to *achieve* high sustainability standards and include cross reference to new additional policy in the Design Chapter and relevant policies in Sustainable Infrastructure.
- New policy to give stronger steer to boroughs to require energy strategies for small sites including reference to specific benchmark standards in line with those set in SI2.
- Additional reference in Policy SD1 to establish that high sustainability standards will be expected in Opportunity Areas.
- Additional reference in Policy SD1 to the need for an integrated systems approach to planning infrastructure and development in the Opportunity Areas.

2. Economic vision and defining ‘Good Growth’

The LSDC strongly supports the commitment to development that is socially and economically inclusive and environmentally sustainable, as the core principle of the Plan. The commission also supports the objectives set out in the ‘Good Growth’ section. However, there is strong evidence that continuing GDP growth in the rich world is incompatible with meeting carbon reduction targets without severely penalising the global south. We therefore strongly recommend that the Plan embeds the concept of ‘sustainable prosperity’ within the definition of ‘good growth’. This will provide a positive framework for the rest of the Plan that is consistent with the principles of sustainable development.

The commission is concerned that the interrelationships between the six Good Growth elements should be more explicitly set out to frame a coherent economic vision. There is a strong link between cities’ environmental performance, urban form and economic prosperity, which has not been made sufficiently explicit in the Plan. This is evidenced in a range of literature from the Stern Review to the OECD and New Climate Economy studies, which show that socially inclusive, resilient, cleaner, quieter and safer cities are also more productive, attract skilled labour and draw inward financial investment. A healthy, well housed, educated population living in an unpolluted uncongested city which embraces new technologies in renewables, connectivity and energy efficiency are likely to more prosperous. Investing in a more compact,

connected and efficient city helps attract talent and investors, spurring economic development as well as improving the well-being of residents. This links all six of the elements into a coherent, economic vision, which does not set 'good growth' as being in tension with or traded off against any kind of faster economic development, but rather that the two are mutually reinforcing.

In order to realise this opportunity to become the dynamic, successful, social, inclusive global city of choice to which the Mayor aspires, there is an urgent need for investment in London's assets. The London Plan has a key role in helping to deliver and direct this investment in a timely way. The Plan therefore needs to be more explicit in recognising that a high quality of life brings investment and prosperity. The policies of the Plan should be framed as economic opportunities rather than expressed as challenges and hurdles to overcome, often at the cost of prosperity. Without this clear vision and positive framing, there is a risk that the Plan will be undermined and there is a missed opportunity in helping to realise London's potential to become a global leader in the transition to a more resilient and sustainable economy.

The commission acknowledges that this vision is articulated in other Mayoral strategies and vision papers (including in the London Economic Development Strategy and City for All Londoners). However, the commission considers that, as the key spatial document bringing together the Mayor's various strategies, the London Plan should clearly articulate a clear vision and intellectual justification for the policies on sustainable prosperity and the direction of the Plan.

Recommendations:

- Embed the term 'sustainable prosperity' within the definition of 'good growth'.
- New section within the Planning London's Future Chapter to set out more clearly the economic vision which underpins the Plan.

3. Inclusivity and Communities

The LSDC strongly supports the principle of 'building strong and inclusive communities', set out in Policy GG1 as one of the three key elements of sustainability which should underpin the plan. The commission is however concerned that these principles of strong, inclusive communities are not effectively carried throughout the rest of the Plan.

In particular, the commission is concerned that the Plan sets out large scale regeneration plans for areas with high levels of deprivation, yet community engagement does not feature strongly as part of these growth plans. The approach to engagement and inclusion should be integrated fully throughout the Plan, and should be particularly strong where it is accompanying large scale growth or regeneration. This includes specific reference to ensuring London residents and communities are encouraged to participate in decision making about spatial development.

In light of the ambitious growth and regeneration targets, the commission supports a presumption in favour of enabling communities to stay together, which should be reflected throughout the Plan. The draft Plan currently presents social infrastructure as only services and facilities, as opposed to relationships. The Plan should be more explicit about the need to enable people to become and stay socially connected within their neighbourhoods and be able to travel safely to meet others, not just to access services.

The draft Plan does not currently define ‘Social Value’ in relation to development and regeneration. Although Social Value is referenced across a number of policies (SD6, E3, HC7, and G1), there is no clear policy strand that coherently ties together a social value policy for regeneration and place making. Consequently, there is no real clarity on the indicators and metrics for social value based regeneration policy. A clear definition should be added to the glossary, acknowledging that it includes interventions, and impacts that create, support and develop improved outcomes and goals for the economy, environment and community, with specific focus on inclusion and equality. The LSDC will be undertaking a piece of work dedicated to understanding how to measure the Social Value of Regeneration. The commission will look to share the outcomes of this work with the GLA and help develop this definition within the Plan.

Recommendations:

- Stronger policy reference to community engagement and involvement throughout the Plan (beyond Policy GG1).
- Explicit reference to community inclusion should be made in relation to Opportunity Areas across London.
- Presumption in favour of communities remaining together in strategic regeneration/opportunity areas.
- Definition of Social Value added to the glossary.
- Additional Policy stating a commitment to social value and equitable regeneration and development.

4. Developing the CleanTech economy

The LSDC strongly supports the inclusion of Policy E8 on sector growth opportunities and clusters. However, the commission is concerned that this policy does not go far enough in supporting the CleanTech economy in London.

The commission is concerned that the current definition used for CleanTech within the draft London Plan results in a missed opportunity for the better integration of CleanTech with other policies. In particular, the definition should be revised to make clear that CleanTech is not a ‘sector’, but a direction for all economic activity becoming more sustainable, which would better reflect its role in the low-carbon economy.

The commission strongly supports the development of a CleanTech cluster in West London, and considers that the London Plan does not go far enough in supporting this opportunity. London’s CleanTech economy is the largest in the UK, however currently has no clear voice, is spatially fragmented and does not benefit from the accelerated growth rates associated with clustering. If London is to achieve the Mayor’s target of a zero carbon city by 2050, then opportunities surrounding CleanTech need to be harnessed more effectively, and in a more integrated way.

More specifically, the commission considers that there should be greater urgency surrounding the promotion of a CleanTech sector in West London, capitalising on the unique opportunity the development offers, and acknowledging the relatively limited timescale for establishing London as a market leader. Support for this cluster of future oriented, environmental enterprises will help London transition to a more resilient and sustainable economy.

The LSDC has already undertaken extensive research surrounding the role of CleanTech and published the report *'Better Future: A Route Map to Creating a Cleantech Cluster in London'*², outlining evidence supporting the proactive development of the CleanTech sector in London. Drawing upon this evidence, it is recommended that the London Plan includes a specific policy on CleanTech clusters, using the text outlined on Page 254, entitled 'low carbon and environmental goods and services sector'. The policy should include reference to:

- Imperial College's new innovation campus, where CleanTech innovation will be a key focus.
- Old Oak Common where HS2 and Crossrail will create fast connectivity between the CIC, the rest of the UK, the City and the rest of the globe via Heathrow.
- A more dense provision of business facilities at Park Royal to create space for CleanTech business on a scale equal to Silicon Valley.

The policy needs to explicitly reference the approach to supporting growth across London's CleanTech sector, as set out in the Economic Development Strategy for London³. For example, the EDS sets out ideas for developing this opportunity in West London, including creating a Centre for CleanTech innovation, and exploring the potential to provide an early stage manufacturing facility to enable firms with potential to prototype innovations. Reference to this strategy, along with other measures such as the provision of affordable workspace and meanwhile uses, will help to articulate what the Mayor and the planning system can do to support the CleanTech economy. Although uses are referenced within the context of housing (Policy H4), explicit reference to the role of meanwhile uses should be made in relation to CleanTech. Similarly, reference to CleanTech should be added to Policy E3: Affordable workspace, as a measure to support this emerging economy. These amendments to the Policy will support an approach that is more directive in creating a CleanTech cluster, as opposed to assuming it will develop organically.

In a similar vein, the LSDC strongly supports aligning opportunities in the CleanTech economy with the Mayor's ambitions for the intensification of Strategic Industrial Land. The CleanTech economy lends itself particularly well to industrial floorspace, and can capitalise on intensification opportunities. There are positive links to be made/ encouraged between Clean Tech and opportunities for SIL intensification, and therefore CleanTech should be explicitly referenced within Policy E5: Strategic Industrial Locations.

Recommendations:

- A specific policy supporting a CleanTech cluster at Old Oak Common and Park Royal.
- Use the following definition of CleanTech - "products and services that avoid or repair harmful effects on the environment caused by human activity".
- Policy E8 should better articulate the Mayor's role in supporting the CleanTech economy in line with supporting strategies such as the London Economic Development Strategy.
- Explicit reference to opportunities surrounding CleanTech in Policy E5: Strategic Industrial Locations.
- Specific reference to CleanTech in Policy E3: Affordable Workspace.

² http://www.londonsdc.org.uk/documents/LSDC_BetterFuture_March2016_FINAL_revised.pdf

³ Economic Development Strategy for London (2017), Innovation and growth across London's CleanTech sector, P. 165 - 166

5. Zero Carbon

The LSDC strongly supports the inclusion of Policy SI2: Minimising greenhouse gas emissions. In particular, the commission welcomes the GLA's ongoing review of the carbon offset price level, and strongly support the requirement that boroughs must establish and administer a carbon offset fund and that major developments are required to monitor and report on energy performance.

The commission supports the Mayor's ambition to become a zero carbon city by 2050. However, the LSDC questions whether the policies of the Plan as currently drafted are sufficiently stringent to meet this target.

The Draft London Environment Strategy (LES) sets out that the Mayor is considering introducing a system of carbon budgets to create an emissions pathway to 2050. These budgets would align with the UK carbon budget periods, with the first starting in 2018 – 22 and continuing in five-year periods, as set out in the UK Climate Change Act 2008.

As the LES states *“Carbon budgets would provide greater clarity and certainty for London (and the UK) to effectively plan for and invest in a low carbon economy”* [p 198]. These budgets, if adopted, should be reflected in the London Plan in relation to the anticipated impact of CO₂ emissions from new development on these budgets, as well as informing London Plan policy (i.e. the new London Plan and future revisions) on the level of onsite carbon emissions savings that will need to be achieved from the new development sector. Providing clear stages to achieving zero-carbon buildings, which acknowledge that the definition of zero-carbon is likely to change over time, would provide developers with a clearer idea of the trajectory the Mayor will require for future development in London.

We strongly welcome Policy SI2 D's explicit requirement that boroughs should establish and administer carbon offset funds – and the accompanying annual monitoring and reporting process in place. The GLA should publish a monitoring template so as to enable boroughs to report annually in a systematic way – allowing a London-wide calculation of CO₂ savings and kWh savings, which can be interpreted more easily.

The GLA should also highlight best practice in the way that offset funds are being used. At present, carbon offset funds are at a risk of being used inefficiently through borough-by-borough approaches delivering piecemeal projects, rather than more strategic targeting major infrastructure opportunities. The London Plan – or some accompanying GLA offset fund guidance – should go further in ensuring consistency across boroughs, and enabling developments to have more certainty in the way their carbon contributions are spent.

Policy SI2 should make reference to how carbon offset funds present an opportunity to support retrofit schemes. Though the London Plan's climate change policies will do much to support the development of low and zero carbon new development in the capital – this building stock will only represent a small percentage of the London's overall built environment in 2050. Alongside the Mayor's existing retrofit programmes, such as RE:NEW and RE:FIT, the London Plan should take a more strategic view on how new development can help contribute to reducing emissions beyond the 'red line' of the planning application. This is necessary if his zero carbon London goal is to be achieved.

Paragraph 9.2.4 of the draft London Plan sets out how zero-carbon targets will be extended to include major non-residential development on final publication of the Plan. This is one of the

most significant proposals in the London Plan, and will ensure that London is a global leader in pushing high efficiency in low carbon new development. Due to the significance of this statement, it is advised that Paragraph 9.2.4 is included directly within the Policy text. It is also advised that the GLA work closely with sustainability professionals, such as the LETI project⁴, to provide new guidance on how non-residential buildings will achieve this goal. Tall buildings, for example, can be very inefficient, and there may be justification for them to adhere to more stringent carbon targets to help meet overall zero-carbon targets by 2050.

Considering the presumption in favour of small sites throughout the Plan, the commission feels that the Plan needs to be clearer about the specific requirements surrounding carbon offset for smaller developments. This includes the need to seek energy efficiency and decarbonisation from small developments. If this is not undertaken on all developments, regardless of size, then there will be a requirement for significant investment in renewables to manage building energy inefficiency. Similarly, further detail on how refurbishment should also aim to meet this policy is required.

The commission is concerned that the draft London Plan does not place enough emphasis, or provide enough detail surrounding, embodied carbon. The requirement for plans to reduce the embodied carbon in construction materials (Para 9.2.10 (K)) should be included directly within policy SI2. There is an extensive body of evidence documenting lessons learnt including the LLDC Learning Legacy paper 'Reducing embodied carbon through efficient design'⁵ which should be referenced in the supporting text.

The commission is also concerned that further detailed guidance should be provided surrounding the role and use of energy masterplans in Policy SI3. Policy SI3 B sets out the requirements for an energy masterplan, however these are largely for district heating masterplans. Opportunities to realise larger scale PV solutions, or anaerobic digestion are not included. Energy masterplans need to understand the full opportunities within a specified area to realise energy efficiency solutions, low carbon and renewable energy generation options as well as passive energy designs, and encourage a more strategic and coordinated approach to retrofitting across Local Plans.

The London Plan has also strongly supported the development of heat networks, and Policy SI3 continues to encourage developers to install district heating wherever appropriate. Major opportunities for heat networks to extend beyond a development, to link into nearby heat loads, are however still being missed. This is why the Mayor proposed in the London Environment Strategy (LES) to *"have a more direct role in the delivery of heat networks, significantly increasing the rate of their development in London"* by establishing *"a District Heating Network Delivery Body for London that secures funding, and in partnership with London Boroughs"*. Such a delivery body is vital if London is to achieve its decentralised energy and zero carbon goals, and reference to this initiative should be made in SI3.

Paragraph 9.3.6 (SI3) states that CHP is not expected to be able to meet the standards required within areas exceeding air quality limits. This is a significant statement as gas engine CHP has been the principal component of the London Plan's drive to increase the amount of decentralised energy in the capital. The draft London Plan should provide further clarification about the future use of gas-CHP in London. Similarly, if the Mayor's ambitions for a zero carbon city are to be met, the Mayor must place greater priority in resolving how these

⁴ <https://www.leti.london/>

⁵ Learning Legacy – Lessons learned from the London 2012 Games construction project (2011), *Reducing embodied carbon through efficient design*.

significant levels of new generation capacity can be accommodated in an electricity network that has not been designed for such operation.

Recommendations:

- Interim targets and clear pathways required to set out how zero-carbon will be achieved in the period up to 2050.
- Specific policy guidance relating to carbon targets for smaller development sites
- Further work should be undertaken to determine carbon offset prices for the non-domestic sector.
- The Policy should make explicit reference to the LLDC Learning Legacy document '*Reducing embodied carbon through efficient design*'.
- Boroughs to present a strategy in 2025 setting out how they will contribute to London becoming a zero-carbon city.
- Reference to carbon targets for non-residential development should be included directly within Policy SI2.
- Reference to the requirement for plans to reduce the embodied carbon in construction materials should be included directly within policy SI2.
- Clear definition of 'decentralised energy' and what solutions it includes within the Glossary.
- Policy SI3 to include reference the full range of opportunities to realise energy efficiency solutions.
- A District Heating Network Delivery Body for London is vital if London is to achieve its decentralised energy and zero carbon goals, and reference to this initiative should be made in Policy SI3.
- Further clarification in SI3 supporting text on the future use of gas-CHP in London
- Policy SI2 should make reference to how carbon offset funds could be spent on retrofit opportunities.
- Policy SI2 to specifically reference taller buildings, and the possible need for higher targets due to greater inefficiency of these buildings.

6. Housing

The LSDC supports the overall principles of optimised density, and making the most efficient use of land through a design-led approach. However, the commission is concerned about that absence of the SRQ Density Matrix⁶ within Policy D6. Within the current London Plan (2016), the SRQ Matrix sets out indicative development density ranges, based on access to transport and setting. The commission acknowledges that density is heavily dependent on a number of site-specific factors, including the area in the planning application boundary, and the size of the residential units. The draft London Plan removes a minimum density requirement for new developments, allowing councils and developers to agree densities on a site-by-site basis.

A number of studies have been undertaken to review and assess the role of the SRQ Density Matrix in setting both density and character across the city. These include evidence undertaken to inform the New London Plan:

- Project 1 Defining Measuring and Implementing Density Standards in London (LSE)

⁶ Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare), Policy 3.4 (Optimising Housing potential), p. 101, The London Plan (2016)

- Project 2 & 3 Lessons from High Density Development (Three Dragons/ David Lock Associates)
- Project 4 Exploring Character and Development Density (Arup)
- Project 5 Why Else is Density Important (LSE)

Key findings from these studies indicate that a number of amendments were needed to the SRQ to ensure it sufficiently reflects the complex character and density of London. These included, but are not limited to, the following:

- Remove setting characteristic of proximity to town centres and arterial routes removed from matrix and accompanying notes
- Removal of named settings
- Revised heights, removing the upper limit of storeys, to make more inclusive of the growing number of areas across London where heights are generally six storeys or above.
- Revised footprints – better reflect the diverse mix of footprints found in many areas across London
- Option to include additional ranges of habitable rooms per unit (hr/unit) and associated values for units per hectare (u/ha)

It was however recognised that the matrix was a valuable policy tool in providing guidelines and a framework for developers and local authorities. It was recommended that the built form setting characteristics of land-use, typology, building footprint, and height are retained and used to define setting, as they are clear, well understood, and less susceptible to varying individual interpretations. The commission acknowledges that high density is important, however extremely high density also calls into question the ability to meet many of the other ambitions such as health, privacy, noise, pollution, access to green space and general quality of life. It is therefore recommended that an updated SRQ matrix is reincorporated into the Plan, in line with amendments sets out in the supporting evidence base.

In relation to tall buildings, the commission is concerned that the draft London Plan allows significant discretion in defining tall buildings, and identifying suitable locations for them across the city. Policy D8 (B) states that *“Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle...”* There is concern that there is limited guidance for boroughs to use in setting these appropriate locations. It therefore places greater burden upon Local Authorities in terms of resource, and limits the ability for tall buildings to be considered strategically across the city. The cumulative impact on the local environment of tall buildings needs to be considered and understood. It is therefore proposed that Policy D8 provides greater detail surrounding an appropriate definition of a tall building, and more detailed considerations for boroughs to use to guide them in identifying appropriate locations. Alternatively, SPG could be developed to provide greater guidance to boroughs.

The commission recognises the contribution that small sites can make to housing delivery in London. However, it also has concerns that the presumption in favour of small sites as set out in H2 (in particular the way that it encourages residential conversions and redevelopment of existing dwellings) could have negative consequences for the provision of family housing in London.

Linked to this, the commission is concerned that Policy H12, and the supporting text does not do enough to support provision of new family housing. A number of the considerations set out in Part A of the policy would favour a mix dominated by smaller units. In particular, the policy

refers to the SHMA which identifies that 55% of the overall requirement is for one bed units. It also refers to the aim to optimise housing potential and the role of one and two bed units in freeing up family housing. As a result, the Policy seems to be driving towards smaller sized housing, and does not give boroughs a sufficient policy basis to be able to negotiate a reasonable proportion of family dwellings. The commission is also concerned that Part C discourages boroughs from setting policies in relation to housing mix requirements for market and intermediate housing. It is considered that boroughs should play an important role in securing an appropriate mix to meet local need and demand across all housing tenures. Part B of the Policy is not strong enough in discouraging schemes which consist entirely of one person or one bed units.

There is a concern that the presumption in favour of conversions and redevelopment of existing homes, combined with the lack of explicit policy support for family housing will not provide a balanced housing mix.

It is therefore suggested that an additional bullet point is added to Policy H12 to highlight the importance of family housing as part of an appropriate unit size mix. This will enable a policy basis for local authorities to secure an appropriate portion of family housing where there is an identified need.

Recommendations:

- Reincorporate the SRQ matrix into the Plan, with amendments to the criteria in line with evidence base.
- Additional bullet point under Policy H12 highlighting the importance of family housing, and supporting Local Authorities in securing an appropriate proportion of larger units.
- Part B of H12 should be amended to make clear that schemes of one bed only will be resisted.
- Additional detail provided in Policy D8 defining what a tall building is, and greater detail on the relevant considerations boroughs should take in identifying appropriate locations.

7. Industrial Land

The LSDC supports Policies E4, E5 and E7 relating to Industrial Land, particularly in moving towards a more integrated vision for industrial uses across the city, and the introduction of ‘no net loss’ approach to industrial floorspace.

The commission however feels that the draft Plan could be more ambitious in its approach to industry in London, and positively embrace opportunities for growth. Collectively, the policies overly focus on servicing, which, although critical to London, overlooks key future opportunities such as urban manufacturing, and ambitions around developing a green/ circular economy. The current wording of the policies suggests a limited function for industry, as supporting the wider economy as opposed to being an integral part of London’s diverse economy.

Policy E4(C) sets out that there should be ‘no net loss’ of industrial floorspace capacity within designated Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). Although the commission supports the principle of ‘no net loss’, this excludes non-designated industrial land, which forms 36% of industrial capacity in London. Similarly, Para 6.4.5 in the

supporting text further states that this 'no net loss' principle does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required. The commission is concerned that the 'no net loss' policy will not work effectively with such large exceptions in place, and will leave a large industrial resource at risk.

As such, the draft Plan could be interpreted as incentivising demolition of non-designated industrial space on small sites, in favour of residential development. Although Policy E7(D) offers some guard against this loss, the draft Plan should explicitly make clear that demolition to this effect will not be incentivised.

The commission also has concerns surrounding how the 'nil net loss' policy will be applied and monitored by boroughs in practice. It is felt that the London-wide application of the Policy is too broad, and open to variation and inconsistency in application. Stronger explanation, guidance and requirements for both local authorities and developers are required to ensure that this Policy is effective.

Policy E4(C) similarly states that the retention and provision of industrial capacity should have regard to borough level categorisations in Figure 6.1. The commission feels that the Plan should not be dividing London Boroughs into 'retain', 'provide' and 'limited release'. The Policy should instead encourage additional capacity wherever possible. Boroughs in the 'limited release' category have been identified as such because they have 'industrial land vacancy rates above the London average' (para 6.4.8). However, the Plan does not provide evidence as to whether the vacancy rate is due to too much land, lack of demand, or whether it is as a result of poor quality existing stock and associated transport infrastructure. Further research into the causes of this vacancy needs to be undertaken.

Policy E5 should be much stronger in seeking to retain SIL wherever possible, and setting a more positive narrative and associated targets for industrial capacity. The Plan should set local authorities annual targets for industrial land provision.

Policy E7 actively encourages boroughs to identify the potential for intensification and co-location of industrial uses. This policy needs to differentiate between intensification (through mixed use including residential) and intensification of industrial uses (via multi-storey etc). There are limited examples of where this co-location has been successfully achieved across London Boroughs, and there is concern that this could result in a substantial loss of SIL. Similarly, intensification of industrial land implies release to residential development, which would result in a decrease in the ratio of industrial space to London population. This ratio should at least be kept constant, to maintain the balance of homes and jobs in the city.

The Policy needs to be strengthened in stated that some industrial land does need to be protected from residential encroachment. Incompatible development located within close proximity of industrial uses can serve to limit the operations of these facilities, particularly as they can generate complaints from residents in relation to noise. The driver for the policy appears to be the release of some land for residential use, rather than increasing the capacity of industrial accommodation and maintaining the function of existing industrial uses

Recommendations:

- Policy E4(c) should remove reference to the exception of non-designated sites and sites previously used for utilities/ transport infrastructure referenced in Para 6.4.5. The Plan should actively protect non-designated strategic land.

- Further explanation and guidance for both local authorities and development on how to implement and monitor the 'nil net loss' policy. This could include supplementary site or area guidance, to ensure consistent application on a more appropriate scale.
- Further clarity needed to explain and distinguish between floor space/yard space in both Policy E4 and E7.
- Further research to be undertaken into the reason behind industrial vacancy rates (i.e. clarity on whether it is a demand issue, or relating to the quality of stock and supporting infrastructure).
- Policy E7 should clearly differentiate between intensification (through mixed use including residential) and intensification of industrial uses (via multi-storey etc).
- Policy E5 needs to ensure that terms such as intensification, substitution, consolidation, and rationalisation are adequately defined.

8. Green Infrastructure

One of the London Environment Strategy's headline goals is to increase London's green cover to 50%. The National Park City initiative which supported by the Mayor, reflects this target in its objectives. As it stands, the draft London Plan does not appear to provide a framework for achieving this goal. Policies such as protection of the Green Belt and no net loss of green cover for new developments may at best help preserve the current level, although likely net loss of private green space and increasing pressures on street trees, for example, would point to a more likely scenario of green cover being reduced over the course of time.

In order to provide a framework for moving towards this 50% objective, it is suggested that the no net loss principle is replaced with a net gain principle – i.e. that loss of green space or cover is compensated by more than an equivalent level. Moreover, the Government's 25 Year Environmental Plan seeks to embed a 'net environmental gain principle for development to deliver environmental improvements. We feel that the 'no net loss of overall green cover' set out in Policy H2 (paragraph 4.2.9) sets out a weaker policy stance that is not consistent with national objectives or the plans for London to align with the National Park City objectives.

The LSDC supports the inclusion of Policy G1: Green Infrastructure, and the principle of green cover and urban greening objectives. However, we are concerned that the Plan is not clear in terms of distinguishing between green cover and green space in relation to the housing policies, meaning there is currently inconsistency in terms of both terminology and policy direction. More specifically, there should be further clarity on what constitutes green cover for the inner London Boroughs. These definitions should be added to the glossary, so there is clarity in the type of provision associated with development, and unintended loopholes for under provision are avoided.

Similarly, the commission is concerned with the new London Plan's emphasis on the role of smaller sites for delivering housing. There is concern that this could lead to the loss of private gardens and local open and green space, which will not be fully replaced. Paragraph 4.2.9, for example, sets a dangerous precedent. It sets out that the loss of green space as a result of housing development can be offset or mitigated through measures such as the *"installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover"*. Green cover in the form of street trees or green roofs is not a comparable 'off-set' for loss of green space. As it stands, the policy suggests that highly valued community pocket

parks could be adequately replaced by an inaccessible green roof that will have no recreational value to the community. The policy should make clear that unavoidable loss of green space should only be replaced with comparable and accessible green space, and that green cover should not act as a proxy for open green space. This will ensure that green space will be maintained, and overall provision not eroded over time.

The commission also feels that policies need to be strengthened to make it more difficult for private green space to be lost. There is concern that there is little mention of how private green spaces and gardens can be protected. The loss of this mosaic of private spaces, for example through tarmacking of front gardens for parking spaces, and the replacement of lawns with plastic grass and decking, is one of the greatest threats to green space in the city and to the target of making 50% of London green by 2050. The draft London Plan should make clear that, where possible, boroughs should resist the loss of private green space. The plan should also suggest a borough-level policy to incentivise private landowners to convert 'grey' space back to 'green' space.

The commission supports the inclusion of Policy G5: Urban Greening. There is concern in the commission however that the responsibility of developing an Urban Green Factor (UGF) to identify the appropriate amount of urban greening required in new developments falls upon boroughs. The commission supports that the use of the assessment tool requires developers of major schemes to provide an explicit demonstration of the type of Green Infrastructure that is possible, which encourages creative thinking early in the design process, beyond green roofs and greening building facades. There is concern however that this policy relies upon individual boroughs developing their own guidance, which could prove particularly challenging for authorities with limited resources. It is therefore recommended that the GLA develop a guidance document setting out a methodology for determining the UGF to help authorities and encourage consistency across London.

Recommendations:

- Amend Paragraph 4.2.9 to make clear that unavoidable loss of green space should only be replaced with comparable and accessible green space, and not green cover.
- Clearly distinguish between the definitions of green space and green cover, and add to the glossary.
- A borough-level policy to incentivise private landowners for converting 'grey' space back to 'green' space.
- Guidance document setting out a standardised methodology to determine the Urban Greening Factor of new developments.

9. Digital Innovation

The LSDC is concerned that the draft London Plan does not place sufficient emphasis on innovation and entrepreneurship, and London's role as a knowledge leader in the new economy.

The Plan should do more to advance digital infrastructure in the capital by supporting integrated technologies which in turn attract new investment. The commission considers that the draft Plan needs to be more ambitious in how London should develop as a Smart City responding to changing circumstances in near real-time. The Plan should provide further

reference to the role of smart systems within the public realm, including ways to engage and interact with people through digital applications integrated into the built fabric.

This requires investment in sensor networks, electronic feedback systems and social media platforms. Applications and platforms such as ‘fix my street’, “Wheelmap” and CitySDK are already paving the way. London can extend its lead in driving innovation on ‘big data’ in order to improve service delivery without increasing budgets through investment in new smart infrastructure.

Recommendation:

- Policy reference (in Policy SI6) to London’s role in driving innovation through SMART systems and advancing service delivery through digital infrastructure.

10. Waste

The commission is supportive of the approach to managing waste sustainably in Policy SI8: Waste capacity and net waste self-sufficiency. However, there are concerns that at present, the draft London Plan does not provide sufficient clarity in a number of respects as outlined below. The commission is concerned that the methodology used to calculate the forecast arisings does not adequately reflect all waste streams within London. The draft London Plan limits predicted waste arising to tonnage of household and commercial and industrial (C&I) wastes only, at the exclusion of all other waste streams. National Planning Practice Guidance sets out the waste streams that should be considered and planned for within local plans, including construction and demolition, low level radioactive, and hazardous wastes. These are currently omitted from the data presented in Table 9.1 and 9.2. These tables are therefore based on a small fraction of the total wastes arising that will be produced by London over the Plan period. From a waste planning perspective, this underestimates the amount of land, premises and capacity needed to be made available by London’s Boroughs to support policy E4 (A3) – the provision for secondary materials and waste management.

Tables 9.1 and 9.2 do not make allowances or contingencies within predicted waste arisings. This would help to ensure that sufficient waste management capacity is maintained during periods of plant down-time or maintenance, and would also help to ‘future proof’ the Borough level apportionments should waste arisings turn out higher than predicted by the Plan. There is also concern that the evidence base used to support the apportionment figures (Task 4 – Updating the apportionment method⁷) refers to PPS10 (P. 2) to justify the approach taken. This document is from 2014, and considered outdated as it is no longer used in Government’s National Planning Policy Guidance for waste.

The commission considers that the assumptions are behind the prediction (in Table 9.3) that the export of waste out of London will drop to zero by 2026 have not been made sufficiently clear and further justification for this is required. London will inevitably continue producing non-recyclable, non-combustible residual waste (non-compliant with input specifications of energy from waste plants within London) for which there is no other option but to dispose of in landfill sites outside London.

⁷ London Plan Waste Forecasts and Apportionments: Task 4 – Updating the apportionment method, Methodology report (2017)

https://www.london.gov.uk/sites/default/files/updated_the_apportionment_method_methodology_report_lowres.pdf

In addition, the commission has concerns surrounding the ambitious recycling targets, particularly given the capacity of recycling facilities.

The LSDC is concerned that Policy SI9 presents a potential conflict between housing and waste, and the potential to lose existing waste facilities to redevelopment. It is therefore felt that the Policy could be strengthened to provide better protection to existing facilities to prevent their loss. It is recommended that the Policy wording is amended to make reference sites that are already compromised through previous encroachment by sensitive receptors.

Recommendation:

- Paragraph 9.8.1 (P. 351) should make explicit reference to the quantity of waste arising that should be accommodated for over the Plan period.
- Further clarity and revision around Policy SI8 (B).
- Revise Table 9.1 (P. 349) and Table 9.2 (P. 350) to include all potential waste streams in line with National Planning Practice Guidance.
- Tables 9.1 and 9.2 to make allowances/ contingencies within predicted waste arisings to help 'future proof' borough level apportionments.
- Revision of Policy SI8 (B) to provide further clarification, as at present the policy intent is unclear.

11. Air Quality

The LSDC is supportive of Policy SI1: Improving air quality, however are concerned that draft Plan is not directive enough in relation to design measures that developments can use to improve overall air quality.

Air quality is a material planning consideration, and therefore the commission feels that more detail should be given in order to demonstrate the type of design that ensures air quality will be improved as a result of development.

A Supplementary Planning Guidance document on sustainable design and construction should be produced, detailing specific guidance for developers on how to reduce the impact of pollution, particularly in areas of high pollution. For example, this could include detail on avoiding the creation of street and building configurations that encourage pollution to build up in public areas, or where people spend time, along with measures to reduce the canyon effect. Guidance provided by the National Institute for Health and Care Excellence (NICE)⁸ could be used to support the SPG as it provides a number of considerations in relation to air quality as part of the plan-making process, and approaches to developing local guidance.

Recommendation:

- A Supplementary Planning Guidance document on sustainable design and construction, explicitly referenced in Policy SI.

⁸ <https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#planning>

12. Sustainable Transport

The LSCDC welcomes the Transport KPI Measure (p.459) setting out an increase in mode share for walking, cycling and public transport towards the target of 80% by 2041.

The draft London Plan does however need to more explicitly recognise that new, disruptive forms of transportation are entering the market. If harnessed effectively, and integrated with spatial planning, these will help the achievement of this target, and improve the quality of life for those both living and working in new developments, and the surrounding areas.

This includes making explicit reference to the Mayor's Transport Strategy (MTS)⁹, and the development of the next generation of road user charging systems to contribute to the number of objectives surrounding mode share, road danger reduction, environmental objectives, reduce congestion on the road network and support efficient traffic movement.

The MTS (Proposal 19, p.83) opens the door to the implementation of smart road pricing (i.e. real time, varying by location and current conditions). However, there is currently no reference to this in the draft London Plan. Possibilities surrounding future road pricing (as a means to reach the 2041 mode share target) needs to be included as part of the wider context in which developments are designed and approved.

Although the commission supports the minimum cycle parking standards set out in Table 10.2 (p.415), there is concern that this does not go far enough in supporting active transport opportunities. Developers should also increase access to both owned and on-demand cycles (including e-bikes and e-cargo bikes) and shared/pooled vehicles. This should be added to Policy T5.

Recommendations:

- Include reference to developments increasing access to owned and on-demand cycles, and shared/pooled vehicles to Policy T5 Cycling.
- Cross-reference the MTS, particularly surrounding road user charging systems, and the role they could play in meeting modal share targets for 2041.

13. Delivering the Plan

The Draft New London Plan gives a high level of discretion to London boroughs in the implementation of some key policy areas, thus placing a considerable resource burden on London boroughs. This includes for example:

- The more discretionary design led approach to housing density now that the Density Matrix has been removed;
- More discretion to locally define tall buildings and decide where they will be considered appropriate;
- The presumption in favour of delivering housing on small sites, including the requirement to produce area-wide design codes; and

⁹ https://consultations.tfl.gov.uk/policy/mayors-transport-strategy/user_uploads/pub16_001_mts_online-2.pdf

- The proactive management of SIL including identifying opportunities for intensification and co-location.

Whilst the LSDC welcomes this collaborative approach to working with the boroughs, there is a concern over the resource capacity and financial position of local authorities, and their ability to deliver these ambitions to a high quality.

The London Plan sets out clearly the Mayor’s role in relation to providing support and leadership for the collaborative preparation of planning frameworks in Opportunity Areas. However, a great deal of London’s growth will be delivered outside these areas in Town Centres, close to transport nodes and on smaller sites in line with the policies of the Plan.

The LSDC considers that the Mayor and the GLA have a role to play providing support and working collaboratively with boroughs to deliver growth outside the Opportunity Areas. It is also important for the Mayor to drive a common understanding of key policy areas and issues such as the opportunities from the green economy. This needs to set out clearly in the London Plan.

Initiatives such as Public Practice have an important role to play in building the borough’s capacity to deliver homes and growth in accordance with the policies of the London Plan. The LSDC would welcome the opportunity to continue to work with the GLA and boroughs to develop leadership networks for borough leaders and encourage collaboration between the boroughs and the GLA.

The commission also feels that understanding how London is effectively performing in terms of sustainable development is key to identifying where and how improvements can be made to improve quality of life. As such, in order to effectively deliver and monitor the London Plan, the Key Performance Indicators (KPI) (Chapter 12) should be revised and restructured to align with the UN Sustainable Development Goals¹⁰. This would enable the London Plan to be clearly mapped against more widely used monitoring tools. As a minimum, there is a need for the London Plan to incorporate performance against the SDGs to be reported in the statutory Annual Monitoring Report (AMR), to be published by the Mayor each Spring. The LSDC is willing to work with the GLA to develop these monitoring requirements to be embedded within the AMRs.

Recommendations:

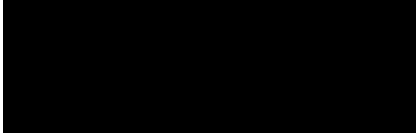
- Explicit reference a commitment from the Mayor to work collaboratively to support London boroughs to implement key policies of the Plan outside the main Opportunity Areas.
- Ensuring that the LP’s statutory Annual Monitoring Report includes monitoring and reporting against the SDGs.

¹⁰ <http://www.undp.org/content/undp/en/home/sustainable-development-goals.html>

This concludes the main point of our response, and I now invite you to review more detailed amendments to the Policy wording and supporting text in the appendix to this letter. Thank you again for the opportunity to comment on the Draft New London Plan.

The commission looks forward to the opportunity to work with the London Plan team and contribute further as the Plan is developed and considered at Examination.

Yours sincerely,



Ashok Sinha
Chair, London Sustainable Development Commission

Appendix 1 – LONDON SUSTAINABLE DEVELOPMENT COMMISSION

The London Sustainable Development Commission (LSDC) was established in 2002 to provide independent advice to the Mayor of London on ways to make London a sustainable, world-class city. The commission is an independent body, challenging policymakers to promote a better quality of life for all Londoners, both now and in the future, whilst also considering London's wider global impacts.

The commission is made up of individual experts from the economic, social, environmental and London governance sectors. Commissioners give their time voluntarily, promoting sustainable development, embedding sustainability into London-wide strategies, and helping make sustainability a meaningful and understandable concept for all Londoners.

For more details:

London Sustainable Development
Commission
City Hall
4th Floor
The Queen's Walk
London SE1 2AA
www.londonsdc.org.uk

APPENDIX 2 - Proposed amendments to policy and supporting text

Table 1 below sets out more detailed amendments to the Policy wording and supporting text, in order to strengthen the overall sustainability agenda, and bring greater clarity to local authorities and developers. These specific changes to Policy wording and supporting text reinforce the points previously outlined in the response, and should be read in conjunction with suggested changes in the main cover letter. The wording amendments have been categorised thematically to align with topic headings in the cover letter.

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
Economic vision and defining 'good growth'		
GG	Page. 9	Revised definition for 'growth' – replace with 'prosperity' or 'economic development' depending on the context. This will identify the Plan with a more forward-looking understanding of the climate agenda.
GG	Page. 11, Para 1.0.7	It is not clear what the phrase 'sustainable growth that works for everyone' means. Further clarity and explanation is required.
GG1 (A)	P. 13	Remove the phrase 'seek to'
GG1 (E)	P. 13	"Ensure that new buildings and spaces they create... are resilient and adaptable to changing community requirements". Further information is required on how this to be implemented in practice.
GG2 (C)	P. 15	Amend wording to include "use this as a catalyst for promoting prosperity and sustainable place-making"
GG4 (C)	P. 19	Amend wording to include "meet high standards of design and sustainability"
GG4 (E)	P. 19	Amend wording to include "milestones to ensure that homes are built quickly and sustainably"
GG5	P. 21	Amend Policy heading to "Developing a sustainable and prosperous economy"
GG5	P. 21	Policy does not mention 'low carbon / sustainable industries', and these are significant industries in their own right.
GG6 (A)	P. 23	Remove the words "seek to"
GG6 (A)	P. 23	Remove the words "seek to"

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
SD1 (B7)	P. 27	Additional bullet point required stating that 'ambitious environmental performance standards for the buildings post-occupancy' must be included. This is crucial in ensuring longevity & relevance of buildings in the future.
Sustainability as a central objective		
SD1	P.41, Para 2.1.57	Further clarity required on overarching sustainability goals for these large scale regeneration schemes. Given the scale of these schemes, they should have stringent sustainable development requirements.
SD7 (A)	P. 81	Policy wording amended to include “this process should support sustainable economic development across...”
SD7 (G1)	P. 82	Policy wording to be amended to “indicative potential for sustainable prosperity”
D1	P. 98	Include specific reference to health and wellbeing, as design is crucial to ensuring healthy buildings, communities, and environments.
D1 (B3)	P. 99	Policy wording to be amended to “ensure achievement of high sustainability standards”. This need cross-referencing to the ‘Sustainable Infrastructure’ policies and the SPG on sustainable construction. Reference also needs to be made to specify high sustainability standards apply to both design and end use/operation.
D1	P. 99- 100, Para 3.1.3	Overheating is a significant issue, and needs elaborating further in supporting text for this section.
D1	P.100, Para 3.1.10	Circular economy design principles need to also be mentioned within D1 or D2 policies to provide more weight.
D2	P. 102	There needs to be specific mention of sustainability standards as part of ‘good design’. Design is the crucial opportunity for influencing much of the sustainability of a development.

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
D2	P. 105, Para 3.2.8	Sustainability standards should be explicit within the role of Design Advocates and included within the guidance on design reviews
D2	P. 106, Para 3.2.9	Needs to be explicitly stated that the 'finish' of a development is not the completion date of the construction - but several years after a development was completed. This allows for occupancy surveys etc to ensure that the building is performing as it was intended to at the design stage. The whole chapter on Design could be considerably enhanced by a more explicit focus on 'in use operational performance' and design outcomes of principles of good design.
D2 (B)	P. 103	Policy sub-heading should be amended to “Determining capacity for sustainable prosperity”. This section requires greater clarity in the supporting text outlining what the sustainable options for growth are.
D4-D6	P. 109- P. 121	These two policies should be integrated into the housing chapter
D4	P.108, Para 3.3.8	The approach to sustainable design should be as strong as it is on inclusive design. This could include further guidance, input on definition of national standards (e.g. zero carbon new buildings) and L&D
D4	P. 109	This policy on Housing Quality & Standards is restricting itself to space standards. Consideration should also be given to other important standards such as thermal efficiency, health & wellbeing, circularity etc.
D6	P. 121, Para 3.6.8	Running costs & service charges should be considered within overall viability assessments up front, as opposed to considering cap costs of construction separately from management and maintenance plans.

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
D7 (J)	P. 123	Further reference to the role of SMART systems within the public realm, including ways to engage and interact with people through digital applications integrated into the built fabric.
D8	P. 126	Explicit reference within this policy that states that tall buildings should only be allowed if they have a planned life expectancy that is very long. This is because their significant social and environmental impact could only be justified if they are around for a very long time (i.e. 100 years +)
D8 (3)	P. 128	Explicit reference to embodied carbon. Evidence suggests that as height increases, the material (and floor area) used increases disproportionately, as greater strength is needed, therefore resource efficiency and embodied carbon becomes more important.
Zero Carbon		
D8	P. 130, Para 3.8.7	Tall buildings often need more common area lighting and lifts which increase base building energy use. There is less opportunity for roof installed PV, however with costs coming down, use of walls and PV-integrated shading might be worth specifying.
G6	P. 311	Specifically reference net environmental gain for larger schemes
H1	P. 144	There is not enough focus on sustainable building mechanisms, such as the use of renewable materials, natural ventilation, and zero carbon.
H2	P. 152	Need to explicitly reference how Local Plans can ensure they comply with stringent sustainability standards in relation to the presumption in favour of smaller sites for housing. The policy currently only refers to major development.

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
H2	P. 157, Para 4.2.9	Principle of 'no net loss of overall green cover' is weaker than the 'net environmental gain' principle put forward in Government's 25 year Environment Strategy published Jan 2018. There is an inconsistency in both the terminology and overall policy direction.
H5	P. 162	The push for higher numbers of new homes cannot be at the expense of sustainability standards since these would be included in 'other policy requirements' but it's not explicit so could be made clearer and stronger here.
SI	P. 319	Chapter to begin with an introduction, setting out a clear vision of sustainability.
SI	P. 324	The Policy title should be amended to "Eliminating greenhouse gas emissions". This should be applied to all of London, not just major developments.
SI2	P. 326	Wording associated with Figure 9.2 should be amended to "at least 35% on site carbon reduction"
SI2	P. 326, Para 9.2.4	The following paragraph should be included directly within the Policy text: "A zero-carbon target for major residential developments has been in place for London since October 2016. This target will be extended to include major non-residential developments on final publication of this Plan (expected 2019).
SI2	P. 327, Para 9.2.6	The 10% and 15% energy targets should reference original evidence base – GLA Energy Efficiency Target: Development Case Studies (AECOM for Greater London Authority)
SI2	P. 327, Para 9.2.9	Major developments are required to monitor and report on energy performance / DEC's for 5 years to GLA. This is not however specified in the policy itself and needs strengthening and expanding to consider all new commercial developments.

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
SI2	P. 327, Para 9.2.10	The supporting text stating that “Boroughs are encouraged to request energy strategies for other development proposals where appropriate” is not clear. Further information and is required to set out what this means in more detail. Specific reference as to who will do the monitoring is required, and also specify how shortfalls in CO ₂ reduction savings will be addressed.
SI2	P. 328, Para 9.2.10 (j)	It is not clear how developers will be able to fulfil this requirement. Further explanation required.
SI2	P. 328, Para 9.2.10 (k)	The requirement for plans to reduce the embodied carbon in construction materials should be included directly within policy SI2.
SI2 (D)	P. 325	Policy wording leaves room for interpretation and is likely to lead to a very wide-ranging set of different approaches and prices being set for carbon pricing, offsetting projects etc across boroughs. The Policy should go further in demanding consistency and enabling developers to have more certainty and confidence in the way their Carbon contributions are spent
SI2 (B)	P. 324	Reference to smaller (non-major) developments should be included, as all new buildings will have to be net zero carbon by 2030 in order to meet the Paris agreement. Reference to embodied carbon should also be made. It is mentioned in the guidance notes but not in the policy, and this will become increasingly significant as operational emissions improve
SI2 (C2)	P. 325	The text that follows provides no guidance on what an ‘off-site’ proposal might be – or what proposals are welcomed or discourage by the GLA. Additionally, there is no guidance to how far from the development ‘off-site’ might be allowed – i.e. could investment in a wind farm outside of London be supported?

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
SI2 (A3)	P. 324	Paragraph 9.2.3 states that “Boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies”. This text should be moved from the supporting text into core policy text.
SI2	P. 328, Para 9.2.10 (i)	Amend text to “proposals explaining how the site has been future-proofed to achieve zero-carbon on-site emissions by 2030 and 2050”
SI3	P. 329	Further reference to innovation and entrepreneurship and London’s role as a knowledge leader in the new economy.
SI3 (B)	P. 329	The requirements for an energy masterplan are in fact largely for district heating masterplans. Opportunities to realise larger scale PV solutions, or anaerobic digestion are not included. Energy masterplans need to understand the full opportunities within a specified area to realise energy efficiency solutions, low carbon and renewable energy generation options as well as passive energy designs.
SI3	P. 331, Para 9.3.2	The draft London Plan document does not provide a clear definition of what solutions it includes within the term ‘decentralised energy’.
SI3	P. 331, Para 9.3.5	Include reference to the GLA’s 2014 London District Heating Manual in terms of supporting the delivery of efficient and reliable heat networks.
SI3	P. 332, Para 9.3.6	A footnote should be provided to the existing ‘Energy Planning Guidance’ document.
SI3	P.333, Para 9.3.10	National Grid no longer operates London’s gas distribution network. This reference should be replaced with Cadent Gas.

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
Chapter 6 Economy	P. 223	Chapter title amended to “Economic Development”
HC6	P. 292	This policy should include reference to light pollution and energy use in night-time lighting
G8	P. 315	The supporting text of this Policy should link up food growing with schools
SI15	P. 336	Policy wording should be amended to include reference to emissions and pollutants associated with water transport, and the urgent need to eliminate them.
T1 (A1)	P. 402	Policy states that 80% is the target for 2041, however an interim target needs to be specified in the text.
T2	P. 403	This section is disconnected from other street-related policies, such as lighting, energy, waste and retailing of healthy products
T8	P. 433	Concern that there is reference to support for “additional aviation capacity” given the emissions associated with this.
T8	P. 433	Permission for expansion should be conditional upon proven net reductions in emissions resulting from expansion.
Air Quality		

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
SI (a)	P. 320	Explicit reference to be made to specific guidance for developers on how to reduce the impact of pollution.
SI (2)	P. 320	<p>Amendment to the wording in Policy SI (2) to include “Development proposals should use design to prevent increased exposure to air pollution and make provision to address local problems of air quality.</p> <p>The following examples should also be included:</p> <ul style="list-style-type: none"> • Sitting living accommodation away from roadsides • Avoiding the creation of street and building configurations (such as deep street canyons) that encourage pollution to build up where people spend time
Waste		
SI9 (A)	P. 355	Policy wording amended to include “existing waste sites should be safeguarded and retained in waste management use unless a site is already compromised through previous encroachment by sensitive receptors.”
Developing the CleanTech economy		
E8	P. 254	Incorporate the final bullet point entitled ‘low carbon and environmental goods and services sector’ should form a Policy in its own right.

Policy ref	Page number/ paragraph	Amendments to Policy wording/ supporting Policy text
Glossary	P. 509	The definition of CleanTech should be revised to include “Clean Technology covers products and services that avoid or reduce the adverse impacts of human activity on the environment. Currently Clean Technology has a particularly strong focus on products and services that combat the causes and effects of climate change.”
Inclusivity and Communities		
Glossary	P. 509	A clear definition of social value should be added to the Glossary, stating that it is about interventions, and impacts that create, support and develop improved outcomes and goals for the economy, environment and community – with specific focus on inclusion and equality.

