

# Pilbrow & Partners

02 March 2017

By Email [LondonPlan@london.gov.uk](mailto:LondonPlan@london.gov.uk)

Mayor of London - Sadiq Khan  
Deputy Mayor for Planning, Regeneration and Skills - Jules Pipe CBE

New London Plan  
GLA City Hall  
London Plan Team  
Post Point 18  
FREEPOST RTJC-XBZZ-GJKZ  
London SE1 2AA

Dear Sadiq,  
Dear Jules,

## **New Draft London Plan - Spatial Development Strategy for London Letter of Representation Pilbrow and Partners**

We are pleased to respond to the consultation and welcome this opportunity to comment on the emerging strategic policies set out in the draft plan.

We strongly endorse the Mayor's strategic aspiration for Good Growth across the City, as well as the renewed focus on the delivery of high quality design and public space. Our comments on the draft policies are reflective of our experience and an appreciation of the limitations and difficulties of the current adopted strategic planning policies in our work.

The practice is currently working on an interesting mix of strategic projects across the City, including within the designated Opportunity Areas of Old Kent Road, White City, Kingston and VNEB. We are working within Central, Inner and Outer London Boroughs on a variety of projects which incorporate heritage buildings, cultural uses and public space.

We are privileged to be included on the GLA/TFL ADUP2 and are pleased to be partner members of New London Architecture and members of The London Society, Westminster and City Property Association. Our award-winning studio comprises UK and international staff based in the creative cultural cluster of Farringdon. We offer senior resource to support Borough Design Review Panels and the Northbank Business Improvement District and to the programmes running across the built environment profession to encourage diversity, skills development and next generation talent.

We look forward to working with you, the teams at City Hall, stakeholders and staff at partner boroughs to deliver the vision for sustainable growth and development in the years ahead

Yours sincerely,

Fred Pilbrow  
Senior Partner

Catherine Jenkins  
Head of Planning & Creative Strategy MRTPI

Pilbrow and Partners Response to Draft London Plan (Draft for Public Consultation December 2017)

POLICY	SUPPORT/OBJECT IN PRINCIPLE	COMMENT
<b>Chapter 1 Planning London's Future (Good Growth Policies)</b>		
Policy GG1 Building strong and inclusive communities	Support	
Policy GG2 Making the best use of land	Support	
Policy GG3 Creating a healthy city	Support	
Policy GG4 Delivering the homes Londoners need	Support	
Policy GG5 Growing a good economy	Support	
Policy GG6 Increasing efficiency and resilience	Support	
<b>Chapter 2 Spatial Development Patterns</b>		
Policy SD1 Opportunity Areas	Support	
Policy SD2 Collaboration in the Wider South East	Support	
Policy SD3 Growth locations in the Wider South East and beyond	Support	
Policy SD4 The Central Activities Zone (CAZ)	Support	
Policy SD5 Offices, other strategic functions and residential development in the CAZ	Object	Policy should seek to achieve a balance between CAZ functions, including offices, commercial uses and residential use. Policy as drafted is overly restrictive and would hinder delivery of residential development in the CAZ as a whole. Delete subsection 3 of policy - Offices and other CAZ functions are to be given greater weight relative to new residential development... “
Policy SD6 Town centres	Support	
Policy SD7 Town centre network	Support	
Policy SD8 Town centres: development principles and Development Plan Documents	Support	
Policy SD9 Town centres: Local partnerships and implementation	Support	
Policy SD10 Strategic and local regeneration	Support	

<b>Chapter 3 Design</b>		
Policy D1 London's form and characteristics	Support	
Policy D2 Delivering good design	Support	
Policy D3 Inclusive design	Support	
Policy D4 Housing quality and standards	Support	Subsection D4 (9 and 10) to be amended to add reference to include winter gardens. The use of balconies should not be the default position to so to enable flexibility in façade design appropriate to site context and environmental conditions.
Policy D5 Accessible housing	Support	
Policy D6 Optimising housing density	Support	Welcome the removal of the current Table 3.2 Sustainable Residential Quality Matrix to enable a design led approach to be taken related to site context and growth aspirations.
Policy D7 Public realm	Support	
Policy D8 Tall buildings	Support	
Policy D9 Basement development	Support	
Policy D10 Safety, security and resilience to emergency	Support	
Policy D11 Fire safety	Support	
Policy D12 Agent of Change	Support	
Policy D13 Noise	Support	
<b>Chapter 4 Housing</b>		
Policy H1 Increasing housing supply	Support	
Policy H2 Small sites	Support	Support for Borough Design Codes and Appraisals for Local Distinctiveness and encourage early delivery of these design guidance documents
Policy H3 Monitoring housing targets	Support	
Policy H4 Meanwhile use	Support	
Policy H5 Delivering affordable housing		
Policy H6 Threshold approach to applications		
Policy H7 Affordable housing tenure		
Policy H8 Monitoring of affordable housing	Support	

Policy H9 Vacant building credit	Support	
Policy H10 Redevelopment of existing housing and estate regeneration	Support	
Policy H11 Ensuring the best use of stock	Support	
Policy H12 Housing size mix	Support	
Policy H13 Build to Rent	Support	
Policy H14 Supported and specialised accommodation	Support	
Policy H15 Specialist older persons housing	Support	
Policy H16 Gypsy and Traveller accommodation	Support	
Policy H17 Purpose-built student accommodation	Support	
Policy H18 Large-scale purpose-built shared living	Support	
<b>Chapter 5 Social Infrastructure</b>		
Policy S1 Developing London's social infrastructure	Support	
Policy S2 Health and social care facilities	Support	
Policy S3 Education and childcare facilities	Support	
Policy S4 Play and informal recreation	Support	
Policy S5 Sports and recreation facilities	Support	
Policy S6 Public toilets	Support	
Policy S7 Burial space	Support	Proposals for reuse of burial space should take account of religious and cultural beliefs and heritage assets.
<b>Chapter 6 Economy</b>		
Policy E1 Offices	Support	
Policy E2 Low-cost business space	Support	
Policy E3 Affordable workspace	Support	

Policy E4 Land for industry, logistics and services to support London's economic function	Support	
Policy E5 Strategic Industrial Locations (SIL)	Support	
Policy E6 Locally Significant Industrial Sites	Support	Policy to be redrafted to permit B1(a and b) in addition to B1(c), B2 and B8 uses to facilitate co location of employment uses. In economic clusters co location of businesses is often key to their success and growth. Greater flexibility in the application of the Use Classes Order should be encouraged.
Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function	Support	
Policy E8 Sector growth opportunities and clusters	Support	
Policy E9 Retail, markets and hot food takeaways	Support	
Policy E10 Visitor infrastructure	Support	
Policy E11 Skills and opportunities for all	Support	
<b>Chapter 7 Heritage and Culture</b>		
Policy HC1 Heritage conservation and growth	Support	
Policy HC2 World Heritage Sites	Support	
Policy HC3 Strategic and Local Views	Support	Suggest additional London Panorama views from South London viewpoints from Horniman Gardens (Southwark) and Gypsy Hill (Lambeth)
Policy HC4 London View Management Framework	Support	
Policy HC5 Supporting London's culture and creative industries	Support	
Policy HC6 Supporting the night-time economy	Support	
Policy HC7 Protecting public houses	Support	Subsection B to be redrafted to amend "foreseeable future" to be specific in timeframe to align with that advised in paragraph 7.7.7
<b>Chapter 8 Green Infrastructure and Natural Environment</b>		
Policy G1 Green infrastructure	Support	

Policy G2 London's Green Belt	Support	
Policy G3 Metropolitan Open Land	Support	
Policy G4 Local green and open space	Support	
Policy G5 Urban greening	Support	All new residential units to be provided with an outdoor tap to facilitate watering of plants to encourage urban greening.
Policy G6 Biodiversity and access to nature	Support	
Policy G7 Trees and woodlands	Support	Suggest that opportunities for tree planting be expanded from strategic locations to all London streets
Policy G8 Food growing	Support	Protection for existing allotments to be reinforced as part of this policy
Policy G9 Geodiversity	Support	
<b>Chapter 9 Sustainable Infrastructure</b>		
Policy SI1 Improving air quality	Support	
Policy SI2 Minimising greenhouse gas emissions	Support	
Policy SI3 Energy infrastructure	Support	
Policy SI4 Managing heat risk	Support	
Policy SI5 Water infrastructure	Support	
Policy SI6 Digital connectivity infrastructure	Support	Subsection A4 should also acknowledge local heritage and townscape context
Policy SI7 Reducing waste and supporting the circular economy	Support	
Policy SI8 Waste capacity and net waste self-sufficiency	Support	
Policy SI9 Safeguarded waste sites	Support	
Policy SI10 Aggregates	Support	
Policy SI11 Hydraulic fracturing (Fracking)	Support	
Policy SI12 Flood risk management	Support	
Policy SI13 Sustainable drainage	Support	
Policy SI14 Waterways – strategic role	Support	
Policy SI15 Water transport	Support	

Policy SI16 Waterways – use and enjoyment	Support	
Policy SI17 Protecting London’s waterways	Support	
<b>Chapter 10 Transport</b>		
Policy T1 Strategic approach to transport	Support	
Policy T2 Healthy Streets	Support	
Policy T3 Transport capacity, connectivity and safeguarding	Support	
Policy T4 Assessing and mitigating transport impacts	Support	
Policy T5 Cycling	Support	
Policy T6 Car parking	Object	Flexibility on provision is required in line with local context. We do not support car free housing developments
Policy T6.1 Residential parking	Object	Flexibility on provision is required in line with local context. We do not support car free housing developments
Policy T6.2 Office parking	Support	
Policy T6.3 Retail parking	Support	
Policy T6.4 Hotel and leisure uses parking	Support	
Policy T6.5 Non-residential disabled persons parking	Support	
Policy T7 Freight and servicing	Support	
Policy T8 Aviation		Support expansion of Heathrow as part of London wide airport strategy to support good growth
Policy T9 Funding transport infrastructure through planning		
<b>Chapter 11 Funding the London Plan</b>		
Policy DF1 Delivery of the Plan and Planning Obligations	Support	
<b>Chapter 12 Monitoring</b>		
Policy M1 Monitoring	Support	

