

Higher Level Policies for Local Plan

preparation. Contents

1. Place design, form, character and capacity for growth
2. Infrastructure
3. Housing
4. Heritage Policies
5. Tall Buildings
6. The Natural Environment, Green and Open Space Policies
7. Waterways
8. Plan making

Introduction

Local Plans should comply with higher level policies including the [NPPF](#) and the [London Plan](#).

Below, are some of the key policies from these documents that the draft plan seems not to reflect very well. Referencing these deficiencies will add much greater weight to consultation responses.

1. Place design, form, character and capacity for growth

National Planning Policy Framework

Achieving well-designed places

Para 127

Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.

London Plan

Planning for growth

D1B In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by:

- 1) using the findings of area assessments (as required in Part A) to identify suitable locations for growth, and the potential scale of that growth (e.g. opportunities for extensive, moderate or limited growth) consistent with the spatial approach set out in this Plan;
- 2) assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; and
- 3) following the design-led approach (set out in Policy D3 Optimising site capacity through the design-led approach) to establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses.

2. Infrastructure

National Planning Policy Framework

Para 20.

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).

Para 34

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).

London Plan

D1.B In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by:

2. assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth;

S1. A When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure.

3. Housing

London Plan

- H1.B To ensure that ten-year housing targets are achieved, boroughs should: 1) prepare delivery-focused Development Plans which:
- a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification

H1.D Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.

4. Heritage

National Planning Policy Framework

16. Conserving and enhancing the historic environment

Para 190.

Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

The London Plan

Policy HC1 Heritage conservation and growth

HC1B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in place making
- 2) utilising the heritage significance of a site or area in the planning and design process
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing

5. Tall Buildings

Secretary of State Letters

[Robert Jenrick letter to London Mayor 10 December 2020](#)

There is clearly a place for tall buildings in London, especially where there are existing clusters. However, there are some areas where tall buildings don't reflect the local character. ... I am issuing a further Direction to strengthen the policy to ensure such developments are only brought forward in appropriate and clearly defined areas, as determined by the boroughs whilst still enabling gentle density across London.

[Michael Gove Letter to MPs 5 December 2022](#)

Character: local authorities will not be expected to build developments at densities that would be wholly out of character with existing areas or which would lead to a significant change of character, for example, new blocks of high-rise flats which are entirely inappropriate in a low-rise neighbourhood. While more homes are needed in many existing urban areas, we must pursue 'gentle densities' as championed by the Building Better, Building Beautiful Commission.

London Plan

Policy D9 Tall buildings

D9A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

- D9B 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.
- 2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.
 - 3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.

6. The Natural Environment, Green and Open Space Policies

National Planning Policy Framework

15. Conserving and enhancing the natural environment

Para 174

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

Para 179.

To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

The London Plan

Policy G2 London's Green Belt

G2B Exceptional circumstances are required to justify either the extension or de designation of the Green Belt through the preparation or review of a Local Plan

Policy G3 Metropolitan Open Land

G3C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B

Policy G4 Open space

G4A Development Plans should:

- 1) undertake a needs assessment of all open space to inform policy.
Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required.
Assessments should take into account the quality, quantity and accessibility of open space
- 2) include appropriate designations and policies for the protection of open space to meet needs and address deficiencies
- 3) promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change
- 4) ensure that open space, particularly green space, included as part of development remains publicly accessible

Policy G6 Biodiversity and access to nature

G6A Sites of Importance for Nature Conservation (SINCs) should be protected. G6B Boroughs, in developing Development Plans, should:

- 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
- 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
- 3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
- 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
- 5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

Policy G7 Trees and woodlands

G7B In their Development Plans, boroughs should:

- 1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site
- 2) Identify opportunities for tree planting in strategic locations

Policy G8 Food growing

G8A In Development Plans, boroughs should:

- 1) protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites

Policy G9 Geodiversity

G9A In Development Plans, boroughs should:

- 1) establish clear goals for the management of identified sites to promote public access, appreciation and interpretation of geodiversity
- 2) ensure geological sites of European, national or regional conservation importance are clearly identified

7. Waterways

London Plan

Policy SI 14 Waterways – strategic role

SI14 Development Plans and development proposals should address the strategic importance of London's network of linked waterways, including the River Thames, and should seek to maximise their multifunctional social, economic and `

Policy SI 17 Protecting and enhancing London's waterways

SI17A Development Plans should support river restoration and biodiversity improvements.

8. Plan-making

National Planning Policy Framework

3. Plan-making

Para 15.

The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

16. Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development
- b) be prepared positively, in a way that is aspirational but deliverable; c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Para 17.

The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:

- a) joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or
- b) a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred.

Para 18.

Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.

Para 19.

The development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time.

Para 32.

Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

Para 33.

Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.