

London Plan Chapter 6 PLACE VISIONS AND APPROACHES

PV1 Brownfield First Opportunity Areas, PV2 Central Activities Zone (CAZ), PV3 Town Centres and high streets, PV5 Industrial Land, PV6 Metropolitan Open Land (MOL)

PV1 Brownfield First Opportunity Areas (BFOAs)

Response by Just Space www.justspace.org.uk

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We request to speak at the Examination.

We do not consider that the following policy identified within the draft London Plan is sound and will outline why and remedy below.

‘Opportunity Areas’ have outgrown their original mandate and are being used recklessly as a crude tool to meet ambitious housing and employment targets, despite this being in conflict with the purported aims of Mayor Khan’s ‘Good Growth’ agenda. There remains an urgent need for a systematic and comprehensive review of Opportunity Areas and their continuing use.

There have never been any systematic evaluations of how OAs are working and no particular organisation has ever been given the clear mandate to conduct such studies. Opportunity Areas are broadly undemocratic, their targets are arbitrary, and the intense development they sanction often displaces valued local land uses and intensifies cost burdens for local residents. There is widespread experiential evidence of the negative effect of Opportunity Areas, especially on poorer and minority residents and businesses.¹

Just Space seeks to embolden the Mayor to reframe the meaning of OAs as spaces of experimentation, spaces to explore options and be a catalyst for new ways of delivering on London development, processes that build on the energy, know-how and creativity of a wide array of Londoners and take equality seriously.

At first sight the re-designation of what have been known as simply ‘Opportunity Areas’ since the London Plan 2004, with some now designated as ‘Transformational Gateways’, and some dropped (e.g. Woolwich), would appear to indicate a review of this extraordinarily under-reviewed policy.

But there doesn’t appear to be any review whatsoever. It is even unclear whether PV1 requires boroughs to put in place specific policies for BFOAs, whether for each BFOA or aggregated at a borough-wide level or beyond.

The term Opportunity Area has been in use since the 1990s, applied to areas where very large scale change through development is planned, in the context of de-industrialisation and the modernisation of employment in under-used industrial, port or railway land, but now for many ordinary parts of occupied London, the aim nowadays being mainly to create development sites for housing through intensification.

¹ The extensive network of hundreds of Latin American businesses at the Elephant & Castle was invisible to the planners and the OAPF, and most of the network was carelessly displaced without compensation, along with the large working class communities on the Heygate Estate.

Community groups in and around the affected areas have criticised and resisted many of these schemes for decades and tried to secure changes to the London Plan policies which govern them, with scant success. The criticisms are that the designation, planning and target setting of OAs have lacked transparency and democracy, as have the mechanisms for implementation. Areas have been planned without the necessary understanding of the social and economic life of the affected areas and the outcomes have mostly been detrimental to working class, including minoritised, communities and to many businesses.

OAs were included in the first iteration of the London Plan (2004), and identified across the city as “capable of accommodating substantial new jobs or homes and their potential should be maximised” (§2.8). OAs were mostly areas of disused or little-used industrial or transport land like King’s Cross and Docklands, but the designation rapidly became applied to areas already fully developed and occupied but where planners want to see redevelopment or intensification – areas with a lot of population and businesses like City Fringe/Tech City or Kingston. Barking Riverside (within the wider OA of London Riverside) has a hybrid geography, partly established residential and commercial areas, and partly reclaimed former industrial land.

OAs were noted as a key part of the policy objective to accommodate London’s growth within its boundaries and without encroaching on open spaces, to “enable the centre of London and the main Opportunity Areas for development to intensify and to accommodate much of the growth in jobs”. (2004, p. 6). Initially the main emphasis was on modernising and expanding employment; since around 2010 the emphasis has increasingly been on getting more and more housing built to satisfy strong developer pressures and add to the housing stock – believed to be a way of making housing more affordable, though targets for affordable homes have never been set for each OA.

But in subsequent years, it is the challenge of meeting housing targets which has become a key driver of OAs, as of most aspects of the Plan. The extremely high prices of houses and flats in London have made residential development highly profitable and pushed up prices of developable land to the point where housebuilding could and did outbid other uses, especially industry and far more land was lost from employment uses than the Plan could have sensibly envisaged.

Criticism of Opportunity Areas has remained largely consistent including:

1) The process and procedures for designating OAs are not evidence-based, are unclear and undemocratic. Boundaries vary without any consistency.² OAs seem to be contrived in discussion between developers/landowners, boroughs and the Mayor, then assimilated to the London Plan. Citizens are sidestepped. The only public deliberation specific to OAs is the consideration as part of the London Plan. Only one half day was programmed in the 2019 EiP for discussion of all the

² The original Waterloo OA and VNEB OA were originally 39ha and 78ha respectively, and 1.5 miles apart (see Map 5B.2 from LP 2004). They subsequently doubled in size to 78ha and 195ha respectively, and are now adjacent, having ‘acquired’ all of Albert Embankment and the South Bank, as well as large hinterland.

established OAs and new ones and broad policies. (The City Fringe was very fraught when introduced and more recently Kingston³)

2) The targets for housing numbers and job numbers lack evidence or systematic justification. These are the main performance indicators used to evaluate their success, while social, environmental and regeneration performance are never examined. The monitoring of these targets is minimal and has recently been downgraded and effectively has been absent.

3) Specifically, the employment targets for the OAs set out in Annex E have been downgraded since LP 2021 by over 200,000 jobs (particularly at Old Oak, Olympic Legacy, Isle of Dogs, Royal Docks, Old Kent Road), although 100,000 jobs have been rustled up in a handful of OAs such as City Fringe, Canada Water and Croydon. The net result is over 100,000 fewer jobs targeted in the remaining BFOAs

4) Monitoring: although there are overall figures for housing completions, the figures or analysis of completed affordable homes and the dwelling mix is more difficult to obtain. There is a similarly dismal reporting on jobs. In both the VNEB and Waterloo jobs were as significant as homes in their original and updated indicative targets. Overall annual employment in each OA is provided since 2015, but with no relationship to developments: for example, they simply report that there were 22,838 jobs in the VNEB in 2015, this dropped to 20,166 in 2016, and stood at 27,934 in 2025. Some of the loss will have been as a result of a major employer vacating an office building constructed in 2002 (in other words, prior to the OA designation, and with no prospect or expectation of redevelopment) and the building having been left vacant in the intervening four years. This is a very different approach to reporting housing development, where they don't report on the existing housing stock along with the new housing development, but simply report on new development. there is no reporting on affordable workspace, undermining the veracity of the claim in Towards a new London Plan (50,000m2 of affordable workspace approved across London 2021-23). Many other key promised or purported community benefits aren't monitored or mentioned. For example, key benefits in the VNEB were to be a new pedestrian/cycle river crossing to Pimlico, removal of the gyratory, and a Linear Park. The latter is referenced no less than 46 times in the VNEB OAPF, but isn't mentioned once in this new 'pen portrait' monitoring; nor is the river crossing. There is no monitoring of the impact on the areas directly outside the OA – yet it is surely a key objective that the city is stitched back together after this major surgery. And there is absolutely no monitoring of what should be core outcomes: the impact on health and on air quality for example.

5) There is a variety of guiding/governing documents which rarely cohere (OAPFs, SPDs, Local Plans), some of which are subject to EiP examination, others not. All should be. Old Kent Road has seen many permissions ahead of a properly approved plan, for example.

³ Kingston is a good example of where an OA was declared with no substantive public deliberation. From the records of a 2018 borough Public Call-In, residents described how “Council appears to have agreed with the GLA behind closed doors to merge the creation of a Local Plan with the creation of an Opportunity Area Planning Framework” and that moreover, “the nature of the growth strategy that Kingston Council is pursuing with the GLA is not made clear in this document”. Furthermore, the public facing Issues and Options document drafted by Kingston Council did not adequately express the different development options available in the Borough. As residents noted, “this document presents two basic Options and asks residents to choose between them. In addition, only one option presented would bear the growth planned by the council. This gives a clear impression that the council’s plans have been predetermined”

6) The management and implementation of the OAs has no general guiding principles, no democracy of its own or effective means for residents to engage with the confusing mix of organisations developing their areas and providing services. Much depends on whatever form of local democratic accountability is practiced in the host borough(s). (Barking Riverside, Old Oak, the VNEB are good examples of the democratic deficit: Southwark has at least (*post hoc*) produced an Area Action Plan for the Old Kent Rd OA, which has undergone examination.) Furthermore, the relationship between the OAs and their surrounding land and communities⁴ is ill-defined and generally ignored.

7) Implementation is preventing development from getting ahead of the provision of transport and social infrastructure. Despite GLA assertions to the contrary, OAs in the Upper Lea Valley and Kingston appear to be dependent on the building of Crossrail2. While major railway investments were so crucial that they were implemented at VNEB and partially at Barking Riverside, this has not been the case at Old Kent Road while delay and non-delivery of health facilities, community spaces and other social infrastructure have remained running sores in many OAs.

8) There is no systematic survey/inventory of the existing locale of an OA or of the areas around it, so the proposals seem to be based on almost a blank sheet approach instead of the actual mass of uses, users and residents (Peckham Vision has been especially vocal on this, also Old Kent Road, and areas adjoining Old Oak Common). Since many OAs are co-located with what was previously designated 'Areas for Regeneration', it is a major failing that they can proceed with so little data and participation from established people and enterprises. The Industrial Inventory at Park Royal is a rare partial exception.

9) The two Mayoral Development Corporations (London (Olympic) Legacy LLDC and Old Oak and Park Royal OPDC) are exceptions in that they each have a special governing institution with planning powers. In both cases, while a dedicated development agency could have pursued more democratic and transparent processes, they rarely did so and private sector and transport interests remained dominant, with representatives of elected councils outnumbered and outvoted. The powers of OA agencies like the Development Corporations do not enable them to acquire land cheaply enough to achieve all they are tasked with achieving and this drives densities ever upwards.

10) Research⁵ and citizens' experience points to Opportunity Areas as having negative effects on poorer residents and many pre-existing businesses through rising housing costs, industrial land values and business rents, often leading to actual displacement. This is the opposite of 'regeneration' and a major failing of the Plan.

The GLA Planning and Regeneration Committee scrutinised the OAs in 2022 and recommended, principally, that the Mayor should:

- Work with boroughs to ensure that residents, businesses and community groups are engaged and involved in the planning process within Opportunity Areas from the outset and prior to their designation.

⁴ Often there are small or negligible communities inside the OA, where they are based on the release of SIL such as at Vauxhall, but have dense communities surrounding them who should be beneficiaries of some of the community infrastructure, but are often explicitly excluded (with s106 for parks collected in the VNEB not eligible for Vauxhall Park, just outside the VNEB, for example)

⁵ Runnymede Trust and CLASS, Pushed to the Margins, 2021 <https://www.runnymedetrust.org/publications/pushed-to-the-margins>

- Monitor and publish comprehensive data giving a breakdown of housing tenure and sizes in each Opportunity Area along with other outcomes. This should include data on demolitions, new homes, and community services. On the committee's specific request in the February meeting for data to include housing demolished and built at social (council) rents, the GLA officer said 'we don't have that; we have to pick up the phone and ask'.
- Explore options for carrying out a full evaluation of Opportunity Areas, which assesses outcomes against objectives, comparisons with equivalent sites in London, impacts on local residents and businesses and value for money.

PV1 B (6) - The plan would benefit from making the requirement to integrate Brownfield First Opportunity Areas with surrounding neighbourhoods more specific, including shared transport, freight, energy and public-realm infrastructure that can also serve existing communities. This would support boroughs in requiring major growth areas to address existing local infrastructure needs rather than functioning as self-contained developments.

PV1 A and B (6) - The plan should require Brownfield First Opportunity Area strategies to identify which infrastructure should be delivered at area level rather than separately by each development, including consolidation, charging, servicing and mobility facilities. This would give boroughs a stronger framework for coordinating infrastructure across multi-site growth areas and securing it through site allocations and planning obligations.

Brownfield registers across London are inconsistent and out of date. London cannot genuinely optimise brownfield land or be able to accurately assess delivery potential until this system is fixed. The capital urgently needs a centralised, standardised, responsive and accessible brownfield data system for identifying and tracking opportunities to make better use of vacant or underutilised land and buildings.

In conclusion, Just Space seeks to embolden the Mayor to reframe the meaning of OAs as spaces of experimentation, spaces to explore or be a catalyst for new ways of delivering on London development, processes that build on the energy, know-how and creativity of a wide array of Londoners and take equality seriously.

PV2 CAZ Strategic Functions

Response by Just Space www.justspace.org.uk

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We request to speak at the Examination.

The aim of this policy – “to sustain and enhance the CAZ as the global, thriving, vibrant, innovative and iconic heart of London and the powerhouse of the UK economy” – lacks clarity and is unsound: a) because it does not identify the key needs of the area appropriately b) because it is not supported by appropriate evidence and c) because reasonable alternatives have not been considered. It is also contrary to the Good Growth key ambitions for social inclusivity.

Like the rest of London, Central London has always been a series of villages and communities, but in Central London these are very close together and accommodate core specialisms and activities in hyper-local neighbourhoods. Apart from in the City of London, there are heavy concentrations of residents throughout central London, including considerable amounts of social housing, which contribute to the experience of social inclusivity.

In many ways this variety and inclusivity – the feeling that central London is for all Londoners, as can be daily witnessed in Oxford Street – makes London distinctive from other large European cities like Paris. This very ordinariness and social inclusivity provides a global identity and an iconic status, exemplified by the red London bus. The physical asset of the centre is extraordinarily valuable financially and is sought after by visitors, as well as being extremely valuable to all Londoners as the heart of our city.

But under successive London Plans central London has gradually been hollowed out as old industries have either died (like Fleet Street) or been forced to move out (e.g. Billingsgate and Smithfield markets) and replaced with visitor-orientated facilities, services and shops, or offices. As has happened in many vibrant places, like Las Ramblas in Barcelona, the emphasis on catering to visitors undermines the special qualities which drew them in the first place.

Central London is losing its connection with all Londoners, and is becoming increasingly a place that can be enjoyed only if you have the financial resources to do so. There is also a loss of a collective civic-ness about the centre, such as the London Mayor’s move from central London to a site 6 miles east – because the rents were too high – which pushed out this key civic function (contrary to the first function set out in Box PV2).

The CAZ is becoming narrower in use (visitor-led/retail/experience economy) and losing its diverse servicing, retail and manufacturing activity (printing, food preparation, specialist shops, small-scale logistics) that sustained the city.

Yet these changes and their effects are not identified or analysed in the Plan. Instead, the list of strategic principles is long and contains uses that are in competition, for example, housing (A10) offices (A11) and affordable workspace (A12) with no comment. The Plan lacks the soundness of being positively prepared: it should address need to provide direction for certain kinds of activity in order to redress the balance.

It is a mistake to chase the global and iconic as the aim of the central London planning policy – these should be the outcome of a successful policy. In PV2 the CAZ is being framed primarily through the visitor/national/international lens and tourism-led uses, with insufficient focus on everyday functions and the needs of Londoners.

There should be clarification of what exactly is meant by an ‘inclusive economy’ (A12) and what it requires. We believe an inclusive economy is key, and that the London Plan needs an explicit policy to protect not only the agglomerations of strategic functions but also the everyday uses and supply-chain activities in central London.

This is also a matter of practicality. Central London’s hospitality businesses need daily access to fresh fish and meat, with 47% of it currently coming from Billingsgate and 33% from Smithfield. The shameful termination of these wholesale markets (and many other parts of similar supply chains) by landowners seeking to exploit high rental values should be resisted, through the judicious use of planning powers, not encouraged or just allowed, as in Part A (11).

The Mayor’s flagship project Opportunity London reveals the crass narrow focus on real estate and investment, and demonstrates how such a narrow approach exacerbates the current number one planning issue, alleviating the remorseless rental and land value increases.

There is also a contradiction between the overall objective of sustainability and the workings of the City’s financial sector (strategic principle A4) which is one of the largest contributors to climate change. The futures markets are the some of the largest contributors to climate change - oil, arms, and development are all funnelled through the City.

Development management (Part C)

The policy is unclear: do the three exceptions all have to apply? Or is the mere fact that a central London site is allocated for housing enough to warrant the net loss of CAZ strategic functions?

Alongside this, it is important that the policy should still maintain protection for existing strategic CAZ function assets in these areas alongside mention of growing these functions.

The policy should give greater recognition to freight and servicing infrastructure as an enabling function of the CAZ, including waste and distribution networks, alongside passenger transport and public realm.

The strategic CAZ diagram

This diagram includes a lot more information, which is confusing and at times too far-fetched to be useful: for example, a relatively compact area like Waterloo has 8 designations (internationally significant culture; health, state, legal and international education; transformational gateway; innovation and life science cluster; two experience economy clusters; and a technology cluster).

PV3 Town Centres and High Streets

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The policy is unsound because it fails to meet the objectively assessed need for social inclusiveness, which is an ambition of the Plan¹.

The rationale for this policy (6.26-27) is mostly well expressed but misses the vital function of our 240 town centres, which is their civic function of providing a shared space of social inclusiveness. All social classes and ethnic groups should be able to access and enjoy the benefits of their town centres.

Social inclusivity is essential for successful town centres. People should be able to shop where they like to shop, not where they are forced to shop. This reflects the requirements of the NPPF to protect local consumer choice. For the NPPF, the objective of policy “is to promote the long-term vitality and viability of town centres by prioritising them as locations for main town centre uses and allowing them to adapt to changing community and business needs, in a way which reflects their locally distinctive roles and opportunities”. (NPPF Chapter 8: Ensuring the vitality of town centres (TC1–4))

To ensure socially inclusive growth, Local Planning Authorities should use the principle of Lifetime Neighbourhoods, which accommodates people at all stages of life, for families to grow and older people to have the shops, services and facilities that they need, with the benefits of enabling families to stay together in the same area if they so choose. A Lifetime Neighbourhood has an emphasis on people, with the neighbourhood a place people feel part of and where they can get together, develop social networks, tackle problems and become resilient.

An important tool for Lifetime Neighbourhoods should be a fact-based community-led local audit, which assesses the contribution of retail, office, commercial and industrial activities, shops selling fresh food, supermarkets, street markets and covered markets, independent shops and specialist and ethnic shops and services. An audit would examine the high street as a public space for congregation and cultural exchange and assess it as a provider of social infrastructure. The audit would be a baseline for the formal protective designation of high streets, in order to prevent the displacement of existing businesses, traders and valued uses. Boroughs should use the audit as evidence to seek Directions suspending the operation of Permitted Development.

All of this is essential if we are to create a denser London which is not simply and crudely responding to the major land value increases this brings. To create liveable lifetime neighbourhoods – reducing the need to travel – communities need to be given a bigger stake in the positives and the decisions to

bring those about, rather than imposed by developers and the blunt instrument that local authorities too often are. We need to support the development of co-operative infrastructures, from the use of local contracting and supporting local business, through to housing co-operatives and platform co-operatives developed at the neighbourhood scale to build community resilience.

The changes to class E have reduced the levers Local Planning Authorities have to shape their town centres. An additional lever would flow from the London plan requiring boroughs to set out local growth strategies: clear plans for key town centres to accommodate growth, or to create Special Retail Areas, including affordable spaces for light industry, business and shops in town centres, as it is small businesses that are impacted in particular by rising rents and issues of displacement. There should be a right of return for businesses in railway arches when redeveloped, for example.

There is also an emerging spatial factor which is not acknowledged: as London's population has grown and densified, and as Londoners move further away from relying on the car, our 600 linear high streets connecting town centres are emerging from a long period of decline. The function and spatial organisation of high streets are fundamentally different to town centres, which focus on transport nodes and agglomerations of activities. Demographic change and 'suburbanisation of poverty' are also reshaping high-street economics and demand. The draft London Plan doesn't reflect this changing reality: making it unsound.

PV3 E

Although street markets are referenced in Part E of the policy, this is only to retain and enhance them, and references London's 'experience economy' (i.e. they should be aimed at visitors, similar to the CAZ). The recent London Assembly report on social value², planning and regeneration recommended including requirements for boroughs to designate new markets, protect street/covered markets, and include social value guidance in local plans to reflect these. Small independent traders need secure tenure and designation/protection: traders' livelihoods are vulnerable to landlord speculation; designations and safeguards are required so local authority and plan policy cannot easily dismiss markets as 'tourist' or marginal.

Wholesale markets and markets more generally are barely represented (wholesale markets are not referenced at all in the draft), despite their strategic importance for food supply and the local economy, and for delivering social inclusion through the distribution of good quality, affordable and fresh food.

Some suggested changes

1. The Plan needs to provide a more detailed policy on protecting existing markets and enabling new ones in every one of our hundreds of town centres and high streets, retaining public ownership of markets and ensuring transparent management arrangements, as well as protecting low rents.
2. Workspaces that produce social value for their surrounding local communities should be recognised as social infrastructure. Covid-19 was devastating for many small businesses, but the resulting closures on the high street and a surplus of commercial and office space have provided opportunities for repurposing space as low-cost workspace with 'social leases'. Social leases would ensure access to local working space hubs that are free or affordable for local residents. The

² <https://www.london.gov.uk/sites/default/files/2025-04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf>

engagement with local authorities and their active role in the delivery of working spaces as social infrastructure is crucial.³

3. Food banks are nowhere mentioned in the London Plan, yet they are one of the fastest growing phenomena related to town centre functions. There are over 300 official food banks across London⁴, an average of nearly 10 a borough⁵. Food bank usage in London has increased dramatically over the past decade. In 2024-25, over 450,000 food parcels were distributed, a 431% increase compared to 2017-18⁶. London's 301 food banks provide a vital safety net for thousands of residents, but demand continues to outpace supply. The Plan needs to acknowledge their value and encourage their location in town centres and high streets with suitable policy.

PV3 A(3) and A(4)

We are concerned that these policies do not reference the protection of existing functions when including a requirement to promote town centres as locations suitable for mixed-use and housing-led intensification. There should be reference to mix, tenure and design principles to ensure that new housing fits in well with existing activities and does not create risks for existing businesses or incoming residents in terms of impact, especially with regard to night-time economy uses.

PV3 A (5)

should include a reference to night time economy opportunities in meanwhile use of vacant sites.

PV3 A (8) and PV3 A (9)

PV3 A (8) should not include an "or" between (i) and (ii). PV3 A (8) and (9) would deny the benefits much edge-of-centre retail can bring. In a rapidly densifying city, low-density edge-of-centre retail sites often remain key anchor points, particularly with larger stores for household goods, and their loss would be contrary to preserving the vitality and viability of the retail centre. The skill of good planning policy is to retain the retail outlet whilst enabling the densification of such sites for additional housing or industrial and distribution uses. For example, in Brixton, two edge-of-centre sites with large car parks (a Tesco and a Halfords/Currys) are important parts of the mix which could not be located in a more central site (due to the unavailability of sites, and also due to the car use they can require) Site Allocations should promote the redevelopment of mid-rise density housing whilst retaining the retail at ground.

³In Milan, the municipality uses vouchers to give free/cheap access to those needing the space. The municipality of Rome gives low rent to the developer in return for free workspace. Rather than viewing workspaces as only a commercial experience, we want to go back instead to the initial principles that moved the first independent co-working experience across Europe: affordability, sharing necessities (or networking) and social inclusion.

⁴ Trussell Trust

⁵ [Food insecurity series: a closer look at London food banks - London Plus](#)

⁶ [Food banks in London reach breaking point as usage skyrockets | North West Londoner](#)

PV5 Industrial Land Supporting Housing Growth

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We request to speak at the Examination.

We do not consider that this policy identified within the draft London Plan is sound. The policy is unsound due to an absence of evidence, is not positively planned, and fails to meet the Good Growth objectives set out in Chapter 1.

PV5 sets out a specific process for the release of employment land for other purposes. This is not appropriate, and we strongly object to the planned or speculative release of significant amounts of industrial and employment land in the context of a rapidly growing population, and of the ongoing release of industrial land across much of the Opportunity Areas of which there has been no effective monitoring, including of their delivery of employment in the OAs.

We have been here before. Paragraph 593 of the Inspector's report from 2019 refers to this shortcoming of monitoring. It has long been a Just Space demand that the impact of Opportunity Areas be reviewed. The following addition to the Monitoring Chapter was approved by the Inspectors in the context of their stated concerns re: displacement and loss of valued cultural assets:

*DNLP: "12.1.7 For specific geographies such as Opportunity Areas (Policy SD1) and Strategic Areas for Regeneration (SD10), for example, **tailored monitoring and investigations will be carried out to inform the implementation of the area-specific policy objectives.**"*

We had been disappointed not to see a more specific requirement to monitor delivery of Homes and Jobs in Opportunity Areas on an annual basis (previously in DNLP 12.1.3) and instead a vague commitment was included:

*"12.1.3.... **Additional measures to be included in the AMR will be explored over time and this will be informed by engagement with relevant stakeholders in the process.**"*

However, this direct request from the Inspector has never been implemented with any evaluative component. Access to raw data is presented (from the Dashboards, KMI, and reference to the London Planning Datahub), without any overview assessment of the impact and implementation of the OAs. <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/londons-opportunity-areas/oa-monitoring-overview>

As the ambition of the current Draft London Plan is to roll out the processes of densification across all areas of London and the release of some industrial land, the lack of evaluation of existing processes, as mandated by the Inspector of the previous London Plan, is unacceptable. Even minimal monitoring information has been withdrawn in the past year, and the information is no longer collated by the London Plan team, we were informed by them at a consultation event: the meagre

information is now produced by another team who provide a 'thumbnail sketch' of the OA, not any serious monitoring information.

We also note that the employment expected to be generated by development in the Brownfield First Opportunity Areas, as set out in Annex E, results in the loss of over 200,000 jobs in comparison with the expectations set out in Policy SD1 of the current LP 2021 (the bulk of losses at Old Oak Common, Olympic Legacy, and Royal Docks/ Beckton Riverside); and although there is also a gain of over 100,000 potential jobs identified across a dozen BFOAs, there is a net loss of 100,000 potential new jobs.

Please note the comments made regarding GLE1, GLE2 and GLE7 on this matter.

We have multiple objections to this policy, including:

- The impact on business growth and employment
- The impact on SME development and growth, impacting disproportionately on BME businesses and communities and working class communities
- The risks of losing industrial capacity critical for the sustainable operation of key elements of the CAZ as well as town centres¹
- The loss of skills and a very wide range of job opportunities
- The importance of retaining land for affordable workspace and start-ups
- Encouraging speculative development over productive economic use

The mixed use redevelopment of industrial land should be required to consider affordable industrial, creative and specialist workspace under GLE7. Affordable workspace shouldn't be confined to office accommodation, but should include light-industrial units for makerspaces, creative production space, and appropriate affordable retail or community enterprise space. Affordability should include service charges, utilities, business rates and fit-out costs, rather than being assessed solely as a percentage discount from market rent. Affordable provision should be secured for the long term, preferably in perpetuity, and should be designed and fitted out for the intended occupiers. The Plan should allow carefully controlled ancillary uses where these are demonstrably related to and necessary for the viability of the main industrial activity. This flexibility should be conditional on this additional use remaining secondary and not undermining overall industrial capacity, which may enable retention and regeneration of industrial land that would otherwise remain vacant or face pressure for complete release.

PV5 should ensure that decisions on industrial land release or relocation consider the actual or potential freight function of a site, including proximity to customers, delivery distances and ability to serve dense inner-London areas. This would help Lambeth assess the strategic value of logistics land rather than relying mainly on floorspace or broad industrial capacity.

¹ Just one example amongst thousands: James Knight of Mayfair guts and processes fish which serve the finest West End hotels and restaurants, at a site on protected industrial land off the Albert Embankment, where most land has been developed with high-rise residential. 50 local semi-skilled workers living within walking distance are employed overnight to gut and prepare the fish, which are then distributed across the West End by electric bike with refrigerator. The location is within a mile of anywhere in the City or West End. There have been 3 attempts to speculatively develop adjacent protected sites with high-rise residential, all seen off by Lambeth Council and/or the Inspectorate and Sec of State.

and strong case that MOL is highly valuable for Londoners, essential to protect, and NOT needed for housing development. SHLAA paragraphs 12.8 to 12.12 refer. Their conclusion is that very small amounts of MOL land (1-3%) might be suitable for development, this is only able to be determined whether acceptable in specific contexts, and it is not a land use type which has a surplus and can be replaced. In 12.10 the SHLAA notes emphatically the value of MOL and that positive management is essential, especially given densification plans. This source of land has not been accounted except as "windfall" for housing, and is therefore NOT needed for development AT ALL.

The Plan-making and Development Management wording needs to be changed to reflect this evidence base.

PV6 B states that "exceptional circumstances" are needed to justify development of MOL. However, **C(2) (i)** makes an exceptional circumstance the **retrospective application** of criteria for new MOL: "The area does not meet the criteria for designating new MOL and is not in a walkable AoD [Area of Deficiency] for AGS [Accessible Green Space]." As MOL has been protected, defined and designated over decades, if not centuries, much MOL will not conform with these criteria. This provides wide scope to find MOL inappropriate in planning terms and opens to a major loss of MOL. This is not the intent of the POLICY AIM on MOL policy, nor the evidence base of SHLAA, nor the rationale presented in para 6.45.

C (2) (ii) is fundamentally unsound, since much MOL is not publicly accessible without charging or membership – Kew Gardens, for example - although it has long been designated MOL.

C(2) (ii) also seems to imply that there is no place for private open space in the London plan, and that development is to be enabled to secure open access. There are many reasons for private open space e.g. to accommodate biodiversity, climate change mitigation, water management. Private open space has a place in this scheme and should not have to be traded against development which will deplete stocks of trees, vegetation cover and cool places. This provision needs to be reworded to more strongly protect green spaces in these areas i.e. consistent with G(i) and G(ii) provisions not to lose open space.

The policy should not make easier for the development of parts of MOL provided that substitute open space is provided, as proposed in Part C (2). It should make clear that quantitative net gain in MOL alone does not justify the loss of strategically important MOL, as its value derives from its location, openness, connectivity and function within London's wider green infrastructure network.

Suggested change: C (2) should be deleted in order for the plan to conform with its own intentions.

Development Management

PV6 F.... "'Very special circumstances' exist when any harm from development including to its functionality is clearly outweighed by strategic benefits, including to its functionality."

PV6 G (4)... "It is to provide transport, utilities or flood risk infrastructure that can demonstrate a requirement for its specific MOL location."

These statements open MOL to the risk of being undermined for the Mayor's "strategic benefits" for transport. Bearing in mind that transport provision is often financed by high rise dense developments through S106, the threat that this opens up to MOL is considerable. The only strategic rationale that is appropriate to protect MOL is that of enhancing its own functionality.

To ensure that the intention to protect MOL is realised, the wording needs to change, for example:

PV6 F.... "'Very special circumstances' exist when any harm from development ~~including to its functionality~~ is clearly outweighed by strategic benefits, ~~including to its functionality.~~"

PV6 G (4)... "It is to provide ~~transport, utilities or flood risk infrastructure~~ that can demonstrate a requirement for its specific MOL location."

PV6 G (3)

There are many cases where proposed new sports facilities are strongly opposed by the public, such as the Save Wimbledon Park campaign, which considers additional tennis courts and show court as a private corporate project, not a contribution to the established principles and benefits of the MOL. This kind of development should not be enabled by the policy, which should be tighter in regard to sports facilities.

Implementation

Paragraph 6.40 should be deleted as it encourages the redesignation of MOL, which would lead to absolute loss of securely protected open space, and goes against the SHLAA assessment that there is no need for MOL land for development. This opens to future development of long valued open space.

The policy should require boroughs to assess cumulative impacts arising from any change, fragmentation or loss of MOL, including impacts on ecological corridors, flood resilience, urban cooling, recreation and access to nature, and on the views of communities affected through meaningful consultation, while ensuring that brownfield and other reasonable alternatives have been exhausted before MOL release is even contemplated.

Furthermore, a robust London-wide evidence base should inform decisions affecting MOL, including assessment of current and future demand for sports facilities, playing fields and recreational land, recognising the critical role that MOL plays in supporting public health, community wellbeing, climate resilience and adaptation, and nature recovery.

Land should only be released from MOL designation through properly accountable changes to the development plan, not through individual planning applications.

Consistent with the Draft Plan's welcomed distinction between MOL and Green Belt, the policy should explicitly clarify within the policy that national Green Belt and grey-belt provisions do not create an automatic route to development within MOL. Proposals enabling development should be required to demonstrate that non-development funding, management improvements and public-sector intervention have been fully explored before development is considered. Without these amendments, PV6 does not adequately demonstrate that London's strategically important open land

will be protected and enhanced in the context of planned growth and increasing pressure on green infrastructure.