

MAYOR OF LONDON

London Plan Guidance

**Characterisation and
Growth Strategy**

Consultation draft

February 2022

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Greater London Authority

February 2022

Published by:

Greater London Authority

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London

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London Plan Policy

[Policy D1 London's form, character and capacity for growth](#)

[Policy D2 Infrastructure requirements for sustainable densities](#)

[Policy D3 Optimising site capacity through the design-led approach](#)

[Policy D9 Tall buildings](#)

[Policy HC1 Heritage conservation and growth](#)

[Policy SD9 \(Part B\) Town centres: Local partnerships and implementation](#)

Local Plan making

Planning authorities and neighbourhood planning groups should undertake a borough or neighbourhood-wide characterisation assessment. This assessment should be used to inform the capacity for change and growth in the different parts of the borough. This includes identifying if there are locations where tall buildings may be appropriate. 'Character types' (defined in section 2.3) should be identified as part of this process, which should form the basis of area-wide design codes for small site development (See Small Sites and Design Code LPG).

Planning Application type and how the London Plan Guidance will be applied

Not directly applicable however a borough or neighbourhood-wide characterisation assessment and growth strategy should be used to inform the design and capacity of a site (see Optimising site capacity LPG and Small Site Design Codes LPG).

Who is this guidance for?

Planning authorities and neighbourhood planning groups should use this guidance at the plan-making stage to undertake a borough or neighbourhood-wide characterisation assessment and formulate a growth strategy and future area-wide visions for their local area.

1 About this document

1.1 What is a characterisation and growth strategy?

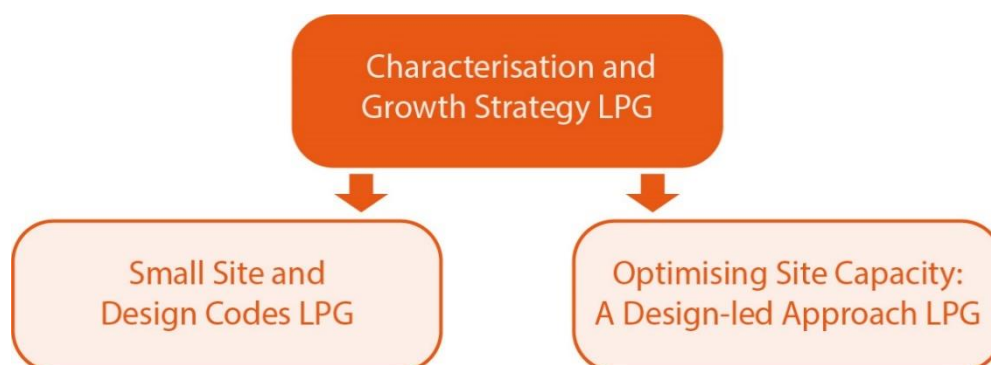
1.1.1 This guidance sets out the first step to a design-led approach to planning for development and managing how a place changes over time. This includes identifying the character and capacity for growth in areas within a borough or neighbourhood area. London Plan Policy D1 (London's form, character and capacity for growth) part A requires boroughs to undertake an area assessment to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. For the purposes of this guidance, area assessments are referred to as a 'characterisation assessment'. This process is a key part of evidence base for local plans. A borough and neighbourhood-wide characterisation assessment and growth strategy can be broken into three stages. These are shown in Figure 1.2.

1.1.2 **Characterisation assessment (or study):** is the process of urban characterisation created by considering the physical, cultural, social and economic elements of a place. These combine to create a local identity for areas that share memories, association and activity. The assessment uses both qualitative and quantitative methods and is made up of:

- 1) a characterisation survey and analysis (stage one),
- 2) evaluation and appraisal of this information (stage two).

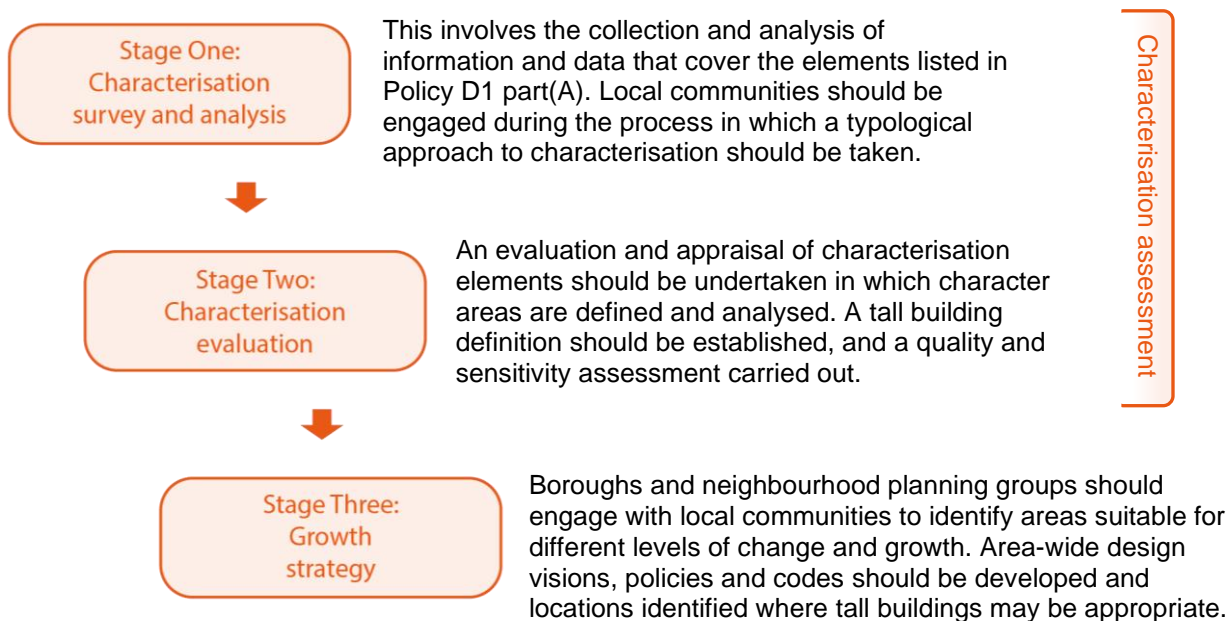
1.1.3 **Growth Strategy:** Reflecting on the characterisation assessment, a growth strategy (stage three) should be developed. This will form the basis of future local or neighbourhood plans, design codes, town centre strategies and site capacity assessments. This process involves identifying areas suitable for different levels of change and growth and should include the development of area-wide design visions and policies. Locations where tall buildings may be appropriate should also be identified.

Figure 1.1 Relationship between the design LPGs



- 1.1.4 A characterisation assessment and growth strategy should be used to inform local plan policies and the design-led approach to potential site allocations (see Optimising Site Capacity: A Design-led Approach LPG) and development of small sites (see Small Site Design Codes LPG).

Figure 1.2 Stages to a characterisation assessment and growth strategy



1.2 Digital approach to data collection and mapping

- 1.2.1 Geographical Information System (GIS) and digital interactive tools should be used when undertaking a characterisation assessment to assist public involvement and the presentation of findings. In particular, GIS software can be used to gather, manage, analyse and present the character of their local authority area. This will allow maps and data to be updated on a periodic basis as well as being easily and publicly accessible on interactive web-based maps.

2 Stage one: Characterisation survey and analysis

2.1 Engaging local communities

- 2.1.1 When undertaking a characterisation assessment, boroughs and neighbourhood planning groups should consult and engage with diverse local communities, businesses, interested parties and the less engaged groups. This collaboration offers the opportunity to learn about what people value within an area and may identify aspects of urban character and identity that might otherwise have been missed. Workshops, surveys and digital tools and apps can be utilised to capture and map the opinions of local communities on the character, identity and lived experience of an area. This may include for instance, understanding preferences in street scenes, architecture and character. This process may also help identify the boundaries to different character areas (see Section 3.2) and aspects such as locally valued heritage, cultural assets and intangible characteristics which may be unique and valued within an area (and / or by different communities).
- 2.1.2 Where neighbourhood planning groups exist, their statutory powers and role in preparation of statutory development plan documents setting out the vision for an area must be provided for through clear, co-designed and managed processes to arrive at a shared characterisation and growth strategy. This role will depend on the stage of neighbourhood planning that has been reached.

2.2 Collect characterisation elements

2.2.1 The first stage is to collect information and evidence relating to the borough or neighbourhood's character. This may include existing information or data that is held or the identification of gaps in this data. A characterisation assessment should cover the following elements listed in part A of policy D1 of the London Plan (2021). These are reviewed in the following section:

Table 2.1 Character elements listed in part A of policy D1

Elements of character	GLA available Data source
1) Demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)	Demographic analysis Demographic projections Planning Data Hub
2) Housing types and tenure	Census information scheme
3) Urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)	Covid-19 Resilience Dashboard Population Projections Explorer
4) Existing and planned transport networks (particularly walking and cycling networks) and public transport connectivity	Long Term Labour Market London Economy Today Indicators
5) Air quality and noise levels	Macroeconomic Forecasts
6) Open space networks, green infrastructure, and water bodies	Safestats London Rents Map
7) Historical evolution and heritage assets including an assessment of their significance and contribution to local character. See Heritage List for England and the Greater London Historic Environment Record .	Public Land Map London Building Stock Model EV charging points
8) Topography and hydrology	London Air Quality Map
9) Land availability	London Heat Map
10) Existing and emerging Development Plan designations	Cool Spaces Map
11) Land uses	Urban Heat Island Map
12) Views and landmarks.	London Solar Opportunity Map
13) Other – these may include cultural, social or economic/commercial characteristics, places and spaces that are valued by the community / different groups, contributing to a sense of place but otherwise not captured above. These are often intangible, but may also include commercial activity, town centres or business clusters which are not identified through the broad Development Plan designations but which contribute to a sense of place e.g Green Street in Newham.	London Street Trees London Green Cover Map Green Infrastructure focus map Natural Capital Map London School Atlas Street Market Map Night Time Observatory Cultural Infrastructure Map Young Londoners Fund WebCat

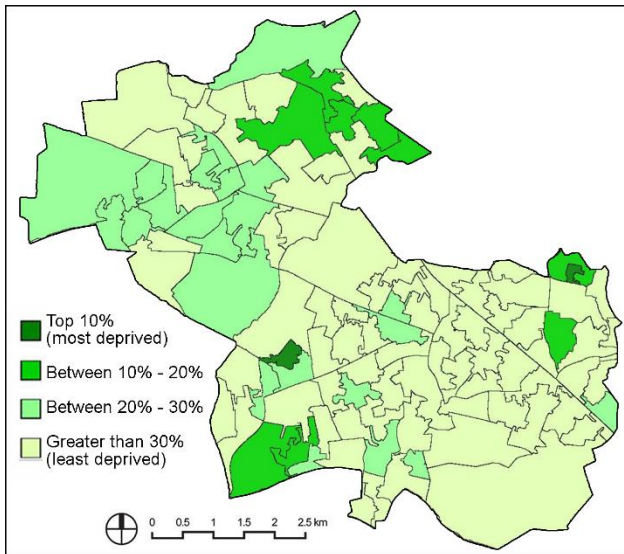


Figure 2.1 Demographic make-up and socio-economic data

Understanding local demographic make-up and socioeconomic is important to understanding the character, identity and needs of a place. This should include statistics on socioeconomic such as the Indices of Multiple Deprivation, population density, Joint Strategic Needs Assessments data, employment data, qualifications of the population, crime data and demographics.

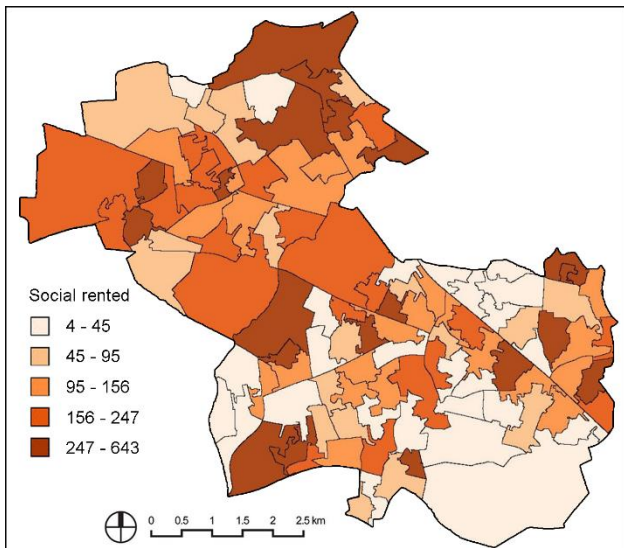


Figure 2.2 Housing types and tenure

Housing types and tenure provide an understanding into the housing need of an area. This is important for delivering mixed and inclusive communities.

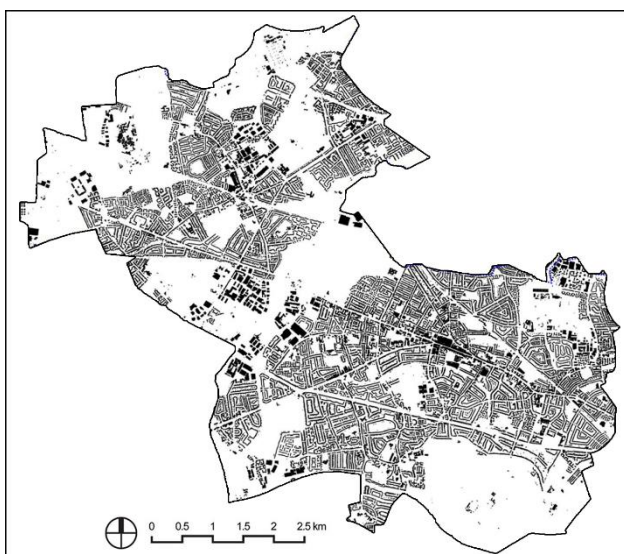


Figure 2.3 Urban form and structure – Built form

Data on the built form of an area should be collected and surveyed. This should include identifying and mapping the 'character types' within an area (section 2.3) and the development of figure ground plans which show the relationship between built and unbuilt space. These can support in an understanding of the existing urban grain, building coverage and built form of an area.

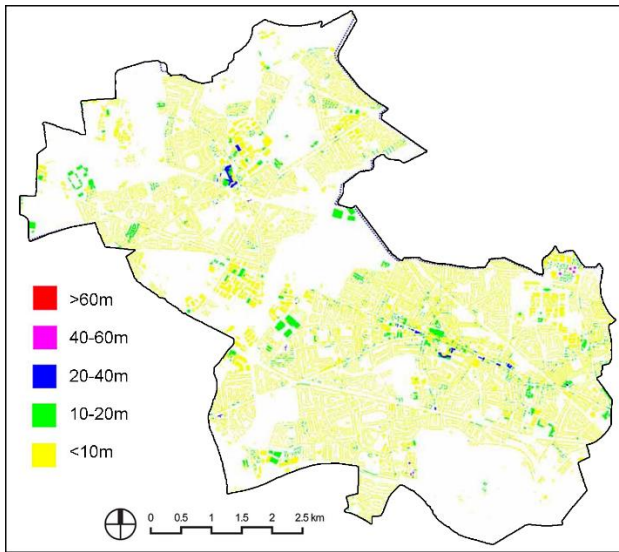


Figure 2.4 Urban form and structure - Building height

Assessment of building heights is important to understand the physical character of an area. Heights are also significant when determining the sensitivity of areas to different building heights of proposed future development. This information should inform the definition of a tall building in all parts of the borough (see section 3.3).

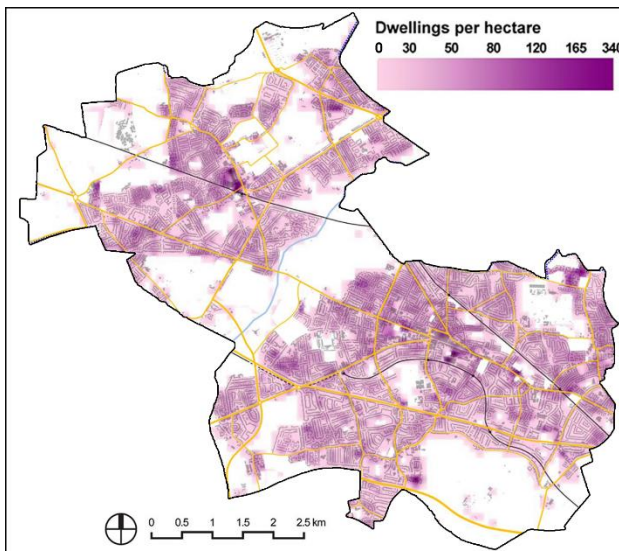


Figure 2.5 Urban form and structure - Housing density

Density is an important characteristic of the built environment. In addition to an assessment of building heights, typologies and building pattern, it can provide a useful analysis of an area's built form. Housing density can also identify areas where greater intensification may be appropriate.

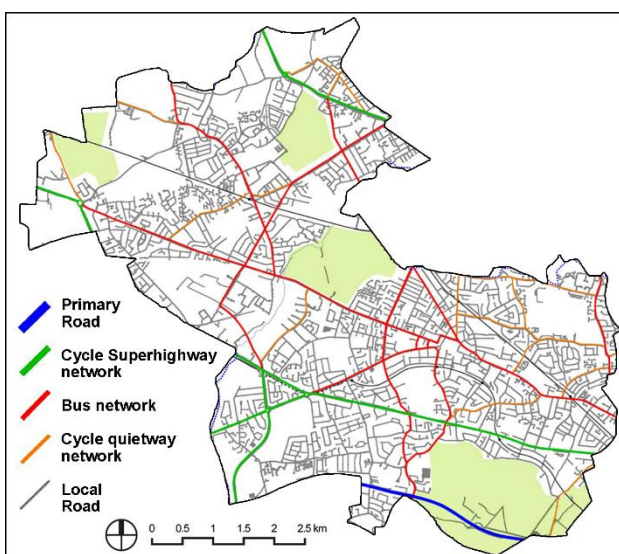


Figure 2.6 Existing and planned transport networks

Understanding the existing street patterns and hierarchies, in relation to how important streets are for both movement and as places, is critical to assessing the potential of linking new development with existing streets and infrastructure. This should include mapping the cycle and bus network and future planned transport projects. (See TfL's [Strategic Cycling Analysis](#)) Road safety data can identify where action is needed.

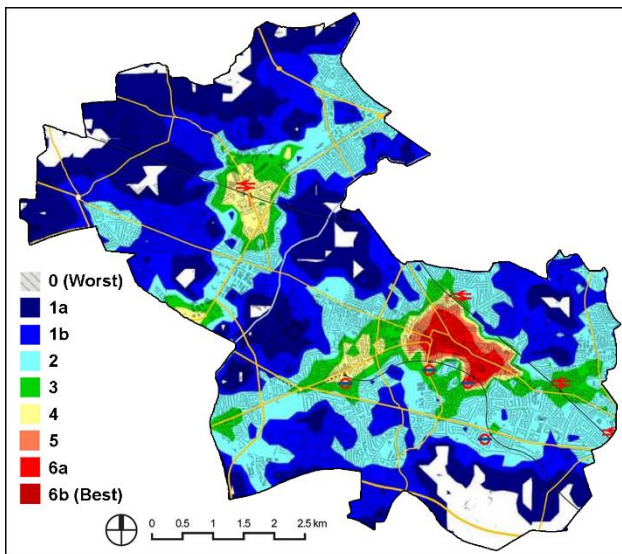


Figure 2.7 Public transport connectivity

Connectivity measures such as Public Transport Access Level (PTAL) and Time Mapping (TIM) should be used to identify opportunities or potential barriers to site optimisation. While areas of good connectivity may be suitable for higher levels of growth, identifying areas of poor connectivity may be useful in understanding where additional infrastructure is needed.

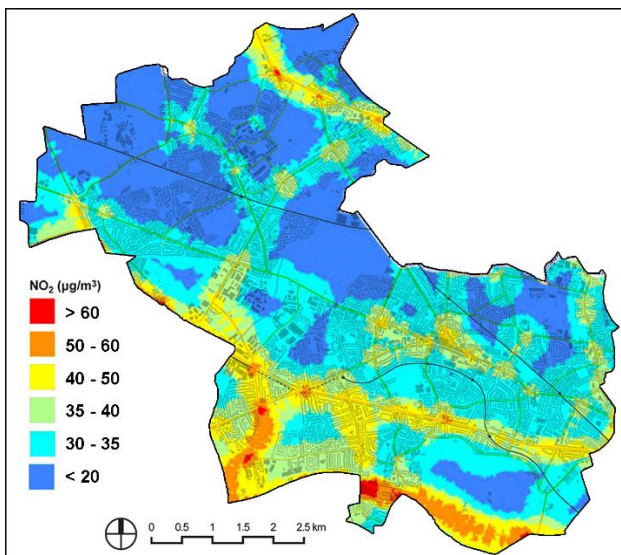


Figure 2.8 Air quality

Mapping local air quality can identify the risks, opportunities and constraints imposed by local air quality conditions. In areas of poor air quality, boroughs should identify ways in which new development and infrastructure can improve these conditions.

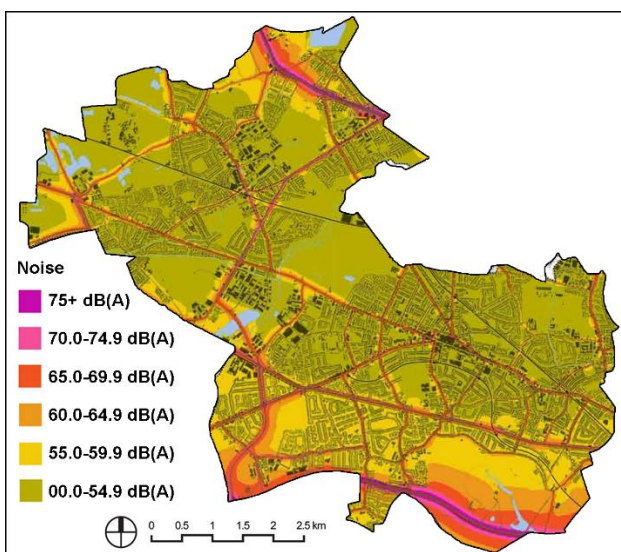


Figure 2.9 Noise levels

Places have “soundscapes” as they have “landscapes”, which can be of high or low quality. Noise levels, from a range of sources should be measured and its impact on the character of a place should be mapped with areas designated as ‘Quiet’ or ‘Tranquil’ identified. In areas of high noise pollution, boroughs should identify ways in which new development and infrastructure can improve these conditions.

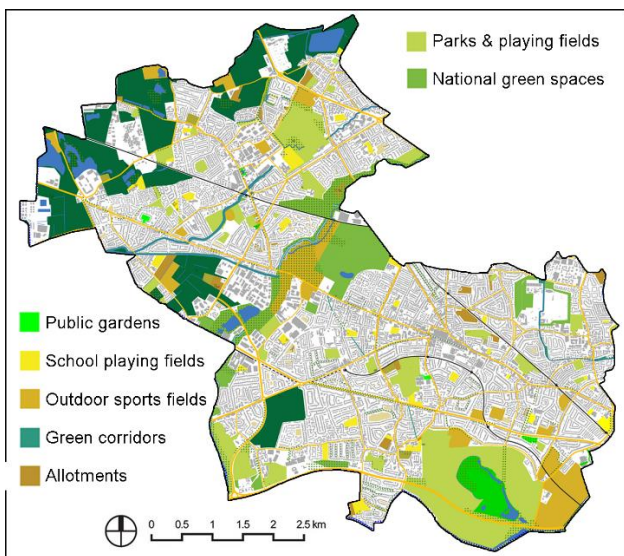


Figure 2.10 Open space networks and green infrastructure

Mapping green infrastructure can assist in understanding the locations which have a lack of green open space. It may also help identify areas that are important for well-being, supporting biodiversity, sustainable urban drainage and reducing the heat island effect. This includes areas of formal and informal urban green spaces.

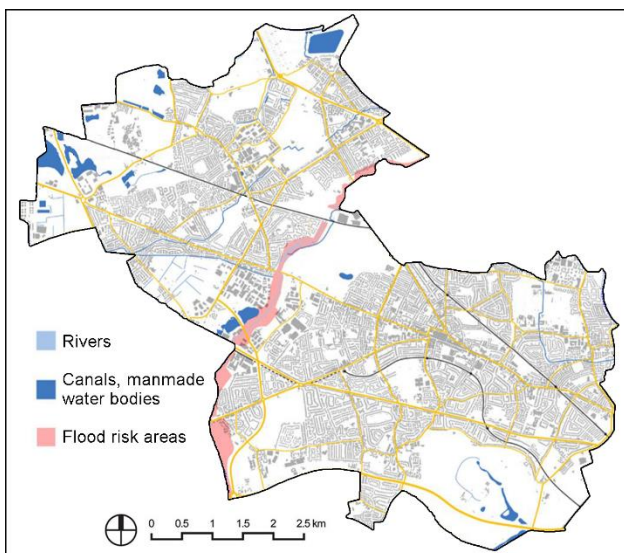


Figure 2.11 Blue infrastructure and flood risk

Mapping waterways and blue infrastructure is important in understanding the landscape, ecology and local amenity of an area. Fluvial and pluvial flood risk mapping can determine the relative probability of flooding, the location of water courses, existing flood defences and areas benefiting from flood defences and flood storage areas.

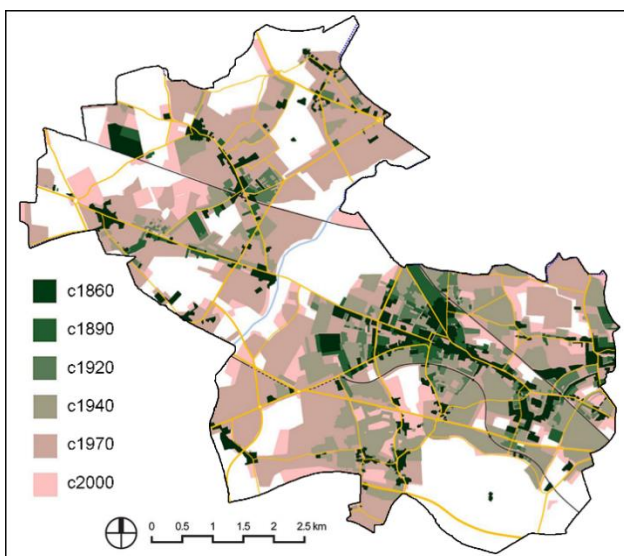


Figure 2.12 Historic evolution and urban growth

Historic maps of urban growth provide insight into how street patterns and urban centres have developed and evolved over time. This understanding can help identify relevant heritage assets able to enhance future developments. Overlaying historical information with other forms of evidence may help reveal valued characteristics or how new development may offer an opportunity to reinstate historic street patterns.

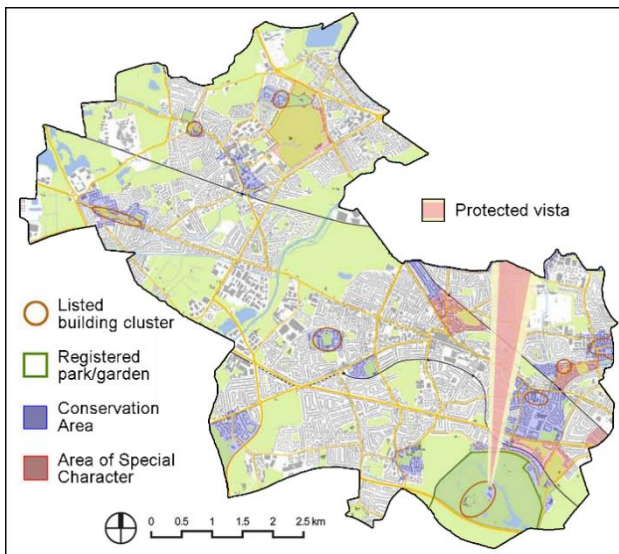


Figure 2.13 Heritage assets

Heritage assets are the valued remaining traces of the development history and contribute much to the continuity of an area’s identity. Identifying and mapping heritage assets (including non-designated) and strategically protected views are significant in providing an insight into an areas sensitivity to change. This includes listed buildings, conservation areas, archaeology, historic battlefields, registered parks and gardens and World Heritage Sites.

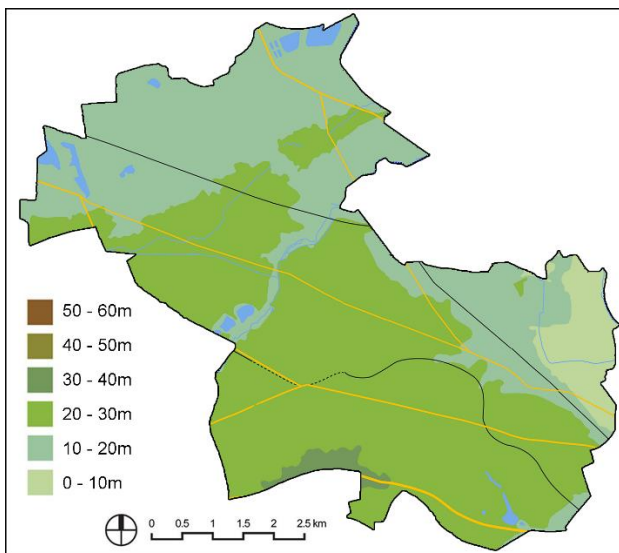


Figure 2.14 Topography and hydrology

Topography underlies and often determines the morphology of development in an area. Where slopes are significant, they can limit street orientation to gentler inclines and may offer opportunities for improved daylight and sunlight levels as well as views. The identification of geological deposits can also assist in understanding natural hazards such as flooding and ground instability.

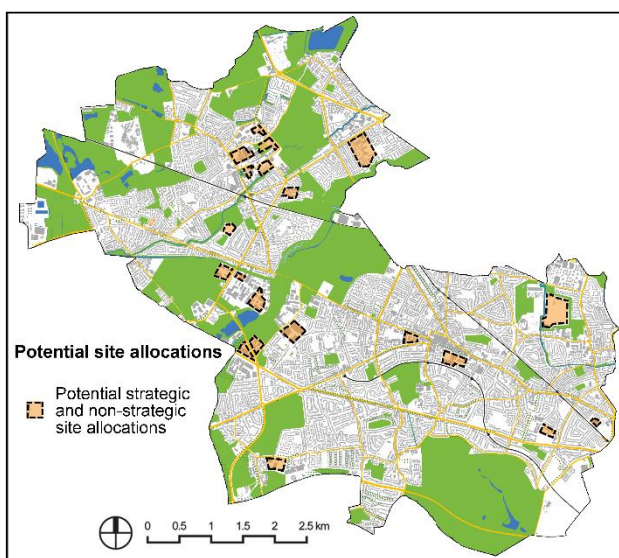


Figure 2.15 Land availability

The availability of land for residential development should be carried out through a Strategic Housing Land Availability Assessment (SHLAA). This process will determine the quantity and suitability of land potentially available for housing development (shown as the potential strategic and non-strategic site allocations opposite).

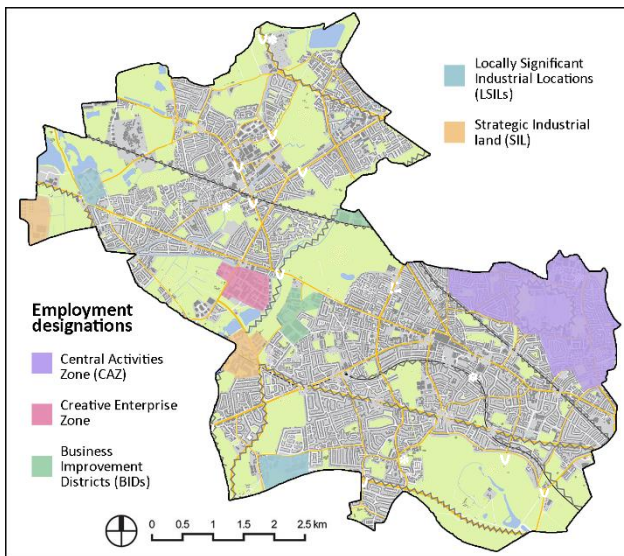


Figure 2.16 Existing and emerging Development Plan designations

Adopted and emerging London Plan, Local Plan and Neighbourhood Plan designations should be mapped. This map should be kept up to date throughout the analysis including any aspects that are changed. It should include town centre, industrial or other commercial designations, Green Belt and Metropolitan Open Land (MOL) and local designations such as areas of special character or clusters.

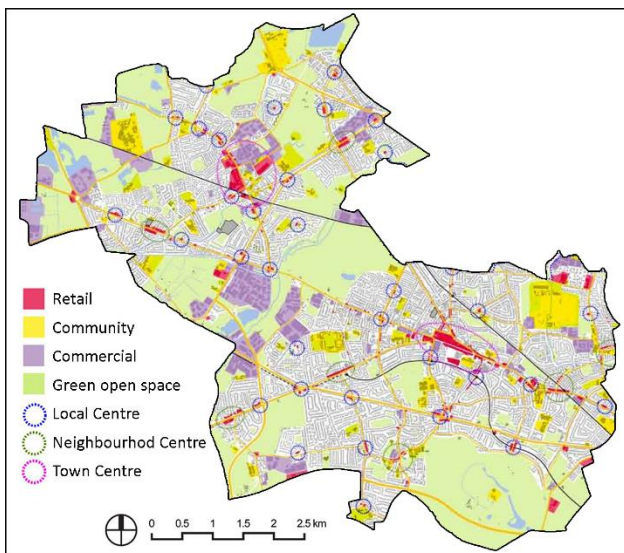


Figure 2.17 Land uses

Mapping land use and how land use activity varies over the day and night can be an important tool to understanding the character of an area. By giving an insight into the mix of uses, this can help identify local centres that are important to the '15-minute city' concept and the liveability and sustainability of an area. Mapping land use and use classes can also highlight locations of industrial land as well as community

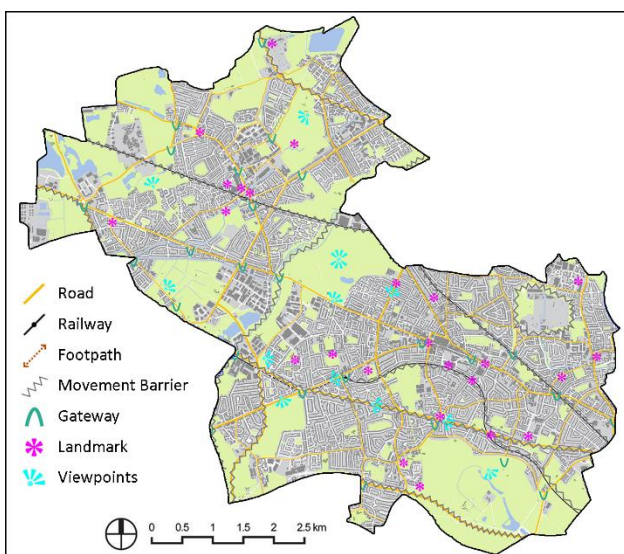


Figure 2.18 Views and landmarks

Legibility is the degree to which a place can be easily understood, remembered, described and above all moved through. This includes important landmarks and viewpoints which provide a sense of location within the larger townscape. Mapping movement can be important to identify key barriers to movement such as railway lines and roads.

2.3 Typological approach to characterisation

- 2.3.1 Boroughs and neighbourhood planning groups should follow a typological/type-based approach to their characterisation studies. This is a system of classification applied to urban fabric according to physical characteristics e.g. land use, built form, townscape and historic origins, rather than a purely area-wide analysis that reviews the history of an area. It has been demonstrated to offer the greatest flexibility in terms of both the information that can be presented, and the uses to which it can be put to.¹
- 2.3.2 A typological approach will enable the identification of ‘character types’ that will occur in several different places within the same borough or neighbourhood (see Figure 2.20). These main character types should be identified and mapped.

2.4 Character types

- 2.4.1 **Character types (also known as Area types):** are the basic unit of characterisation and are the building types or typologies within an area. Types are generic, not geographically specific, and can occur in more than one location in the borough or neighbourhood (see Figure 2.20). These types should be identified through use of the [London Historic Characterisation Thesaurus \(LHCT\)](#). Examples include the *Basic Terrace* and *Metroland Estate* types (see Figure 2.19 for the definition).
- 2.4.2 While the term ‘character type’ is more commonly used in existing characterisation studies, the term ‘area type’ is used in the [National Model Design Code](#). These two terms (character type and area type) can be used interchangeably within this document.
- 2.4.3 Each character type shares common features and characteristics such as their built form, typology and architectural form. Where appropriate, these types will also form the basis of a coding plan for a borough-wide small site design code (see Small Site Design Codes LPG). Each of the identified character types should be analysed to identify its strengths, weaknesses, opportunities and threats.

¹ [LUC \(2016\). ‘London Plan review: Project No. 3: Characterisation of London’s historic environment’, Historic England](#)

London Historic Characterisation Thesaurus

2.4.4 Boroughs and neighbourhood planning groups should use the [London Historic Characterisation Thesaurus \(LHCT\)](#) when identifying character types. This allows holistic consideration and monitoring of character, and how it is changing, across Greater London. This aims to address issues of inconsistency between boroughs' assessments (for example giving different names for the same thing or borough's being characterised at different levels of detail) by providing a clearly defined set of terms with which to record London's character. Articulating the character of different areas using the same language as its neighbours will also enable them to not only understand their distinctiveness in context but also understand what is truly significant about it and lead to detailed London-wide characterisation data. For further details on how to use the LHCT, see Appendix 1 and 2.

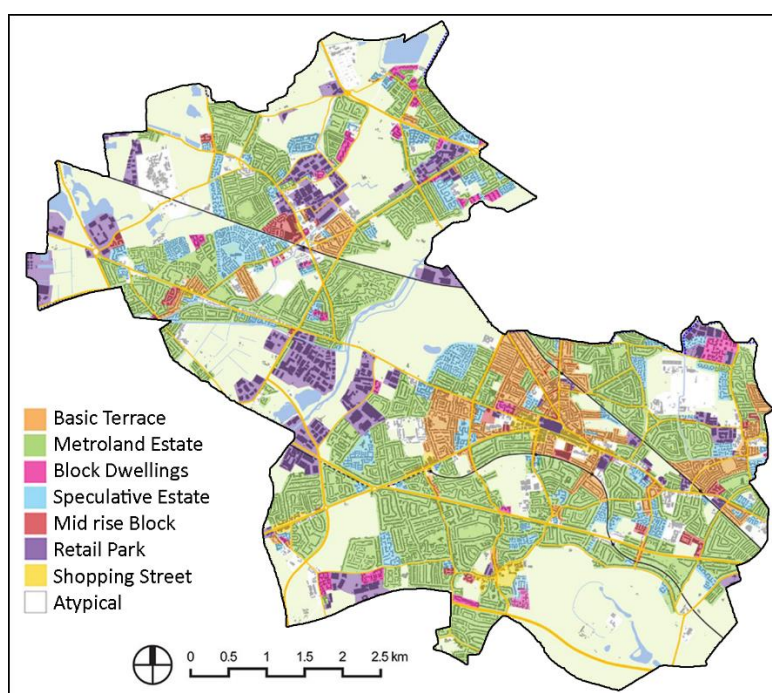
Figure 2.19 Screenshot of the Metroland Estate definition within the LHCT

Broad type	Intermediate type	Narrow type
Urban Settlement	Housing Estate	Metroland Estate

Narrow type scope note

Development of private houses on large tranches of land with easy access to suburban rail. Consisting of semi-detached dwelling houses with private front and rear gardens, inspired by the Garden Suburb movement. Typically in an applied half-timbered 'Tudorbethan' style, although Art-Deco inspired, restrained Moderne also features. Details and material finishes often higher quality or more decorative than contemporary estates designed for the working class, such as stained and leaded windows, 'sunburst' glazed doors. They were constructed from the 1910s with the majority built in the interwar period. Initially they were built by the Metropolitan Railway Country Estates (a subsidiary of the Metropolitan Railway Company founded to develop land owned by the company near their lines) but other speculative developers took up the style and built similar estates around the fringes of London near rail or underground lines.

Figure 2.20 Example map of character types (also known as 'area types')



3 Stage two: Character evaluation

3.1 Interpretation of data collected

- 3.1.1 Following a characterisation survey and analysis, the information collected should be reviewed, interpreted and evaluated. This stage involves defining the boundaries of different character areas and then carrying out a quality and sensitivity assessment of each character area. As part of this process, the definition of a tall building should be specified.

3.2 Character areas

- 3.2.1 As part of a character assessment, boroughs and neighbourhood planning groups should analyse how the different elements of character interrelate and overlap creating different character areas. These character areas are critical for analysing and developing a local area-wide vision or framework as outlined in section 4.5.
- 3.2.2 **Character areas:** are single unique geographical areas and places that may contain a number of character types. Their boundaries tend to be based on a locally recognisable community, neighbourhood or town centre (such as Wimbledon town centre for instance). Where a Neighbourhood Area has been designated, character area boundaries should be consistent with Neighbourhood Area boundaries.

3.3 Defining boundaries

- 3.3.1 Using the information collected and analysed during stage one, boundaries between different areas of character should be identified and defined. These boundaries are likely to be in places where there are hard edges such as a river, stream, road or open space but may also be in places where there has been an identified change in character (such as a significant change in the character type, age of buildings or architectural style).

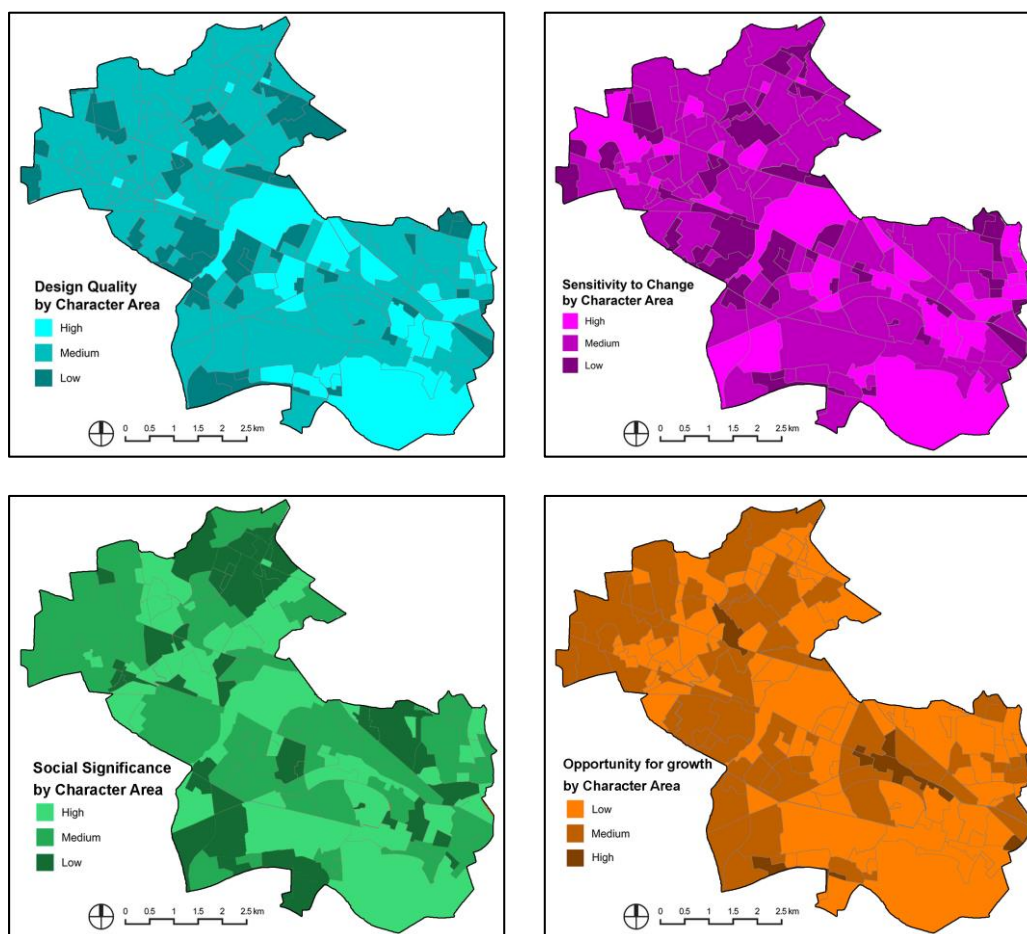
3.4 Quality and sensitivity assessment and mapping

3.4.1 To help inform which areas of the borough or neighbourhood have capacity to change, the qualities of each character area should be assessed under the following criteria:

- i) Design quality
- ii) Social and cultural significance
- iii) Sensitivity to change
- iv) Opportunity for growth

3.4.2 This assessment should be carried out on each character area identified rather than each character type. Using the criteria in Appendix 3, each area can be rated low, medium or high for each assessment criterion. This helps give an overall picture of the place; its design quality; social and cultural significance; sensitivity to change; and opportunity for growth. This process also helps to define what makes a place feel special or unique and as a result, assists in understanding what level of change may be suitable. Assessment of these criteria can be mapped as shown in Figure 3.1.

Figure 3.1 Local character appraisal evaluating design quality, social and cultural significance, sensitivity to change and opportunity for growth



3.5 Tall building definition

- 3.5.1 Boroughs should use the analysis of building heights across the borough to define in their development plan what is considered a tall building for their area as required by part A of Policy D9 Tall buildings. This definition should identify the height at which a building becomes substantially taller than its surroundings and causes a significant change to the skyline. Boroughs are not encouraged to use this as a way to control the height of buildings which are slightly higher than the prevailing height. It will be more effective to use other design policies than a tall building policy to manage these heights.
- 3.5.2 The whole borough needs to be covered by a tall building definition. This can be in the form of one borough-wide definition or different definitions for different areas to reflect changes in building height across the borough. As a result, it must be clear if a proposed development in any part of the borough is a tall building or not, and thus determine if Policy D9 and any local tall building policy apply. The definition should be stated as the total height of a building in metres from ground level or AOD level to the top of the building including any rooftop equipment. The definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This equates to a minimum height of 21 metres from ground level to the top of the building (assuming a floor to ceiling height of 3 metres for the uppermost storey).
- 3.5.3 Tall building definitions should not use a relative height (such as 'twice the prevailing height' for instance) or subjective terms (such as 'substantially higher than the neighbouring buildings'). Multiple definitions should not be used for the same area. The tall building definition should not be misinterpreted to mean that all buildings up to this height are automatically acceptable. Such proposals will still need to be assessed in the context of other planning policies.
- 3.5.4 Boroughs should also consider cross-borough/boundary implications of their tall building strategy and collaborate with relevant boroughs where necessary. This process should consider views including local views, conservation areas and character of nearby neighbourhoods.
- 3.5.5 Local Plans should identify all locations where buildings above the tall building definition height may be acceptable in principle (see section 4.5). As a result, boroughs should ensure that their tall building height definition/s are set at heights that are substantially taller than their surroundings and cause a significant change to the skyline. Local plans should also set out in supporting text the harms that tall buildings would cause outside these locations, supporting implementation of Policy D9 (B3) should any such tall building proposals come forward (see section 4.5).

4 Stage three: Growth strategy

4.1 Consulting the local community

4.1.1 Following completion of a borough or neighbourhood-wide characterisation assessment, local communities and neighbourhood forums should be engaged and collaborated with on a series of design visioning placemaking exercises to identify the following for each character area:

- i. Areas suitable for different levels of change and growth
- i. Area-wide vision and policies for these different areas
- ii. Locations where tall buildings may be an appropriate form of development.

4.1.2 This process of community engagement and consultation is separate from the engagement on character and identity in stage one. At this stage, boroughs and neighbourhood planning groups should work with communities and local businesses on how to accommodate the level of change and growth required for certain areas. This collaboration should ensure that any changes to the physical environment achieve an overall positive contribution. An area's growth strategy should help deliver strong and inclusive communities and provide access to good quality community spaces, services, amenities and infrastructure. This can be assisted through the use of data led tools to understand the community's opinions on an area's local amenities and preferences in street scenes, architecture and character. Boroughs and neighbourhood planning groups should also ensure that all parts of a community are engaged with and their views taken account of.

4.2 Neighbourhood Planning

4.2.1 Where an area has a neighbourhood planning group, development of the growth strategy must be a co-designed process informing both local and neighbourhood development plan documents. Where a neighbourhood plan has been made for an area it takes precedence over local plan policies where they are in conflict unless they have been superseded. The agreed growth strategy should also inform the housing requirement for designated neighbourhood areas.

4.3 Identifying areas suitable for different levels of change and growth

- 4.3.1 Findings from the characterisation assessment should be used to identify areas suitable for different levels of change and growth within the local authority or neighbourhood boundaries. Areas should be categorised into one of the three areas of change: conserve, enhance or transform and their capacity for growth should be assessed. This process should be based on the evaluation of character and results from assessing the area's design quality, social and cultural significance, sensitivity to change and opportunity for growth. A central component of a growth strategy will be to plan how an area's strengths and weaknesses will be further enhanced, mitigated or addressed. This categorisation of areas of change should be mapped to show the spatial distribution of these categories so it is clear which category a particular location falls under (see Figure 4.7).
- 4.3.2 These categories are intended to be a useful indicator of the potential for an area to support different degrees of change and growth and used as a tool not a designation. This exercise should be used to support in the setting of design visions, policies and parameters for different areas within the borough or neighbourhood. It should also inform the design-led approach to potential site allocations (see the Optimising site capacity: Design-led approach LPG). In particular, they can help inform the form and massing of site allocations as well as help assess windfall sites that come forward in these areas.

Conserve areas

- 4.3.3 These are areas of consistently high quality and coherent character such as conservation areas and designated green spaces (such as MOL and greenbelt). These will include areas that are deemed to be of highly positive character. In conserve areas, change must be undertaken particularly sensitively to maintain the existing quality and character of the area.

Figure 4.1 Example of a conserve area



Development coming forward in conserve areas should draw on the predominant typology and architecture in the area and reflect this in its proposal. Materiality and detailing should reflect the local vernacular while development heights should closely resemble the prevailing height. For areas with a particularly rich diversity of architect and styles, conservation area Appraisals and Management Plans may also be useful.

Figure 4.2 New development in a conserve area (before and after) which draws strongly on positive aspects of the existing character such as the dominant roof line, typology and architectural detailing



Enhance areas

- 4.3.4 These are areas of mixed design quality in which incremental change should seek to enhance the overall character of the area. The attributes that contribute to the positive character within these areas should be identified and articulated in an area-wide vision. This should inform development coming forward in these areas to ensure that these attributes are reflected in proposals.

Figure 4.3 Example of an enhance area



- 4.3.5 It may also be appropriate to identify existing aspects that negatively impact the character and therefore what new development should not emulate. While there is an opportunity for new forms of design and architecture in these areas, any proposal should respect and draw on the special and valued features of the existing area. The height of a new development should be sensitive to the prevailing heights in the area although there may be opportunities for a transition in height on appropriate sites and there is the opportunity for the materiality and detailing to reflect the local vernacular.

Figure 4.4 New development in an enhance area (before and after)



Transform areas

- 4.3.6 These are areas that currently have low-quality development of ill-defined character and where an opportunity exists to establish a newly-coherent character. New development should both enhance positive elements where they exist and improve the physical character through placemaking to create attractive new places. The new character should reflect the area-wide vision which may be significantly different from the existing character. It should not result in car-dependent, sprawl-type development – and, indeed, provides important opportunities to change such developments that currently exist..

Figure 4.5 Example of a transform area

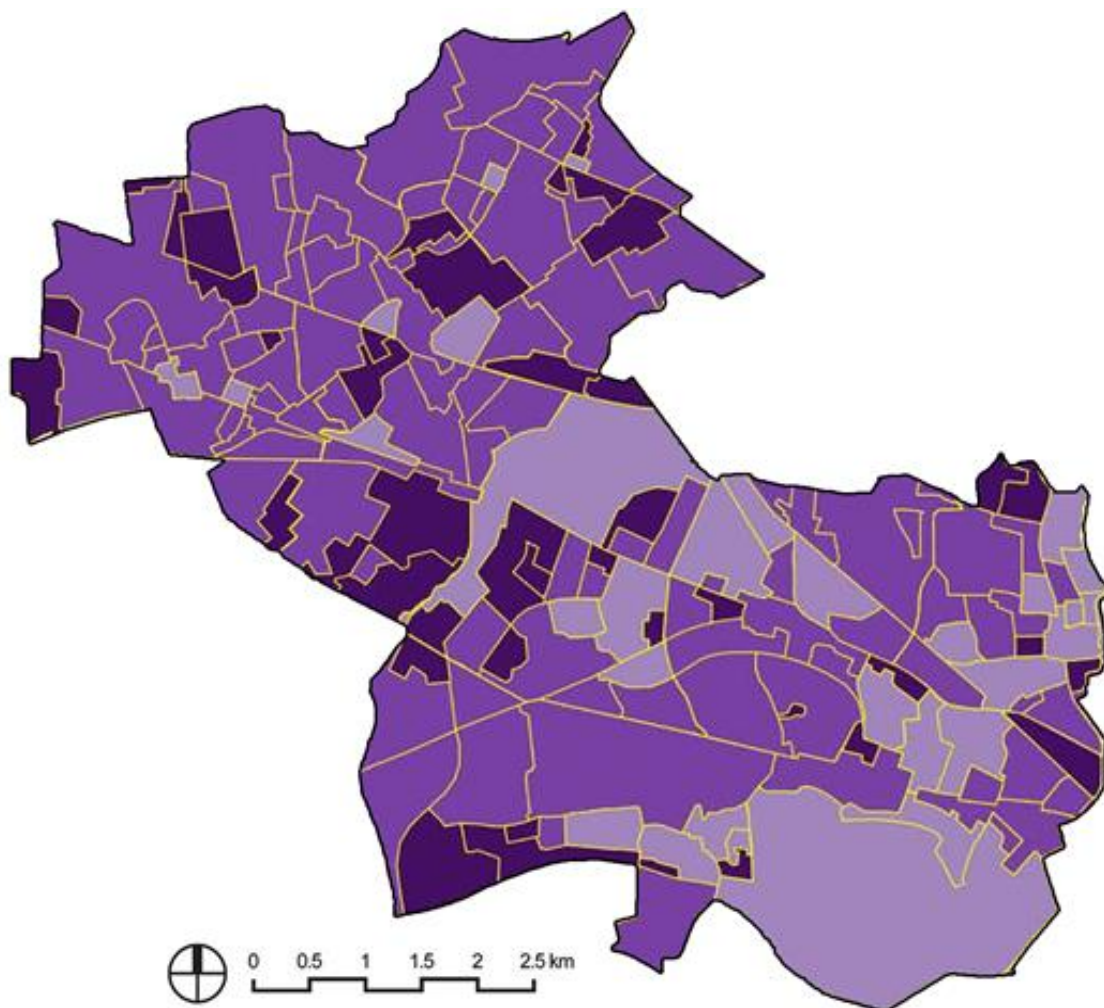


- 4.3.7 Transform areas should intensify land use when accommodating change – and it is vital that the approach to higher density development reflects good urban design principles. Transform areas will not necessarily be locations where tall buildings may be appropriate. Where an area includes heritage assets or is within the setting of heritage assets, this does not exclude it as a transform area. Similarly, areas that have pockets of intact, high quality urban fabric should not be excluded, but clear guidance given how the transformation of the area will retain and enhance these valued remnants.

Figure 4.6 New development in a transform area (before and after)



Figure 4.7 Example of an areas of change map



- Conserve: areas that have a high quality, well-established and coherent character that is sensitive to change
- Enhance: areas that have a medium quality, mixed character that would benefit from sensitive improvement through intervention
- Transform: areas that have a low quality, poorly defined character and/or where an opportunity exists to establish a new coherent character by enhancing positive elements

Capacity for growth

4.3.8 Following the identification of areas suitable for different levels of change, boroughs and neighbourhood planning groups should determine each area’s capacity for growth. An areas capacity for growth is different to the level of change envisioned in its character. For instance, in certain areas where there is an opportunity to transform the character, there may be the capacity for extensive growth while in others there may be a more limited capacity. An areas capacity for growth will be dependent on the information determined during the character assessment (stage one) and the findings from the opportunity for growth assessment (detailed in Section 3.4). This process will ensure that an area will optimise the benefits of good existing public transport (or planned investment). The potential scale of growth should be assessed on a scale from limited to extensive growth using the opportunity for growth criteria in Appendix 3 together with the other quality and sensitivity assessment criteria. The matrix shown in Table 4.1 below should be used to assist in this process.

Table 4.1 Capacity for growth and change matrix

	Conserve	Enhance	Transform
Limited	<p><u>High quality and coherent character with limited capacity for growth</u></p> <p>Successful design quality</p> <p>High social and cultural significance</p> <p>Sensitive to change</p> <p>Low opportunity for growth</p>	<p><u>Mixed quality of character with limited capacity for growth</u></p> <p>Some success of design quality</p> <p>Some social and cultural significance</p> <p>Some sensitivity to change</p> <p>Low opportunity for growth</p>	<p><u>Low-quality or ill-defined character with limited capacity for growth</u></p> <p>Not successful design quality</p> <p>low social and cultural significance</p> <p>not sensitive to change</p> <p>Low opportunity for growth</p>
Moderate	<p><u>High quality and coherent character with moderate capacity for growth</u></p> <p>Successful design quality</p> <p>High social and cultural significance</p> <p>Sensitive to change</p> <p>Medium opportunity for growth</p>	<p><u>Mixed quality of character with moderate capacity for growth</u></p> <p>Some success of design quality</p> <p>Some social and cultural significance</p> <p>Some sensitivity to change</p> <p>Medium opportunity for growth</p>	<p><u>Low-quality or ill-defined character with moderate capacity for growth</u></p> <p>Not successful design quality</p> <p>Low social and cultural significance</p> <p>Not sensitive to change</p> <p>Medium opportunity for growth</p>
Extensive	<p><u>High quality and coherent character with extensive capacity for growth</u></p> <p>Successful design quality</p> <p>High social and cultural significance</p> <p>Sensitive to change</p> <p>High opportunity for growth</p>	<p><u>Mixed quality of character with extensive capacity for growth</u></p> <p>Some success of design quality</p> <p>Some social and cultural significance</p> <p>Some sensitivity to change</p> <p>High opportunity for growth</p>	<p><u>Low-quality or ill-defined character with extensive capacity for growth</u></p> <p>Not successful design quality</p> <p>Low social and cultural significance</p> <p>Not sensitive to change</p> <p>High opportunity for growth</p>

4.4 Area-wide visions and policies

- 4.4.1 Following the identification and mapping of areas appropriate for different levels of change and growth, area-wide visions and policies should be developed as part of the Development Plan or neighbourhood plan. These should consider an area's capacity for growth (See paragraph 4.4.8) and should set out the specific aspirations for future development as well as setting parameters for the scale of development and change that is planned for. Accommodating the borough's growth requirements, including its overall housing target, need to be considered in this process. These parameters, or in some case design codes, should be used to provide clarity and certainty about what is acceptable in principle in different areas within the borough or neighbourhood. This must take account of the design-led approach in Policy D3, with higher density development promoted in locations that are well connected to jobs, services, infrastructure and amenities by sustainable transport modes. It will also inform the optimisation of sites (see Optimising Site capacity: A Design-led Approach LPG). While area-wide visions, policies and codes are encouraged for all areas, this will be particularly significant for areas where substantial change is envisioned.
- 4.4.2 Area-wide visions should be informed by an understanding of the demographic make-up and socio-economic data identified during the characterisation analysis. Visions should take into account the different needs of specific groups within the community and the potential future population, with a particular focus on creating inclusive and accessible neighbourhoods (as required by Policy D5 of the London Plan) and informed by equality impact assessments, as required under the Public Sector Equality Duty.
- 4.4.3 Where greater change is proposed, the character elements of significant value and attributes that contribute to the place's distinctive character should be identified. Using these, boroughs and neighbourhood planning groups should ensure that new development respect, enhance and utilise these assets of character that contribute towards the local identity. Being a transform area is not the same as being an area identified as a location where tall buildings may be suitable. Consequently, greater capacity and contribution towards the local character may be achievable through mid-rise development rather than tall buildings (see Figure 4.8 for an example). In areas undergoing significant change or where there are multiple development sites, it is encouraged to formulate a coherent approach to the redevelopment of these sites. This may include approaching the design or master planning of multiple sites together, rather than as individual sites.
- 4.4.4 As part of the digital approach outlined in Section 1.2, boroughs and neighbourhood planning groups are encouraged to digitally map their site allocations to ensure they are publicly accessible. This shift from maps in

pdfs to online digital maps also allow maps to be updated and amended as the masterplan progresses.

Boundary conditions

- 4.4.5 The potential for expanding existing areas of higher density in locations that are well connected to jobs, services, infrastructure and amenities by public and active transport modes should be explored before boundaries are finalised (Policy D3 part B). Once boundaries are decided, the treatment and management of boundary conditions between different levels of change should be carefully considered. This is to ensure that the character and setting of areas sensitive to change are not harmed and that there is a transition between different character areas. In this respect, the edges where transform and conserve areas meet should be carefully planned to ensure there is appropriate transition between the two areas. This also includes the boundary edges between boroughs, and therefore there is a need for close collaboration with neighbouring boroughs. Conservation areas or areas within the setting of London's World Heritage Sites for instance, are sensitive to tall buildings. Where a site is within the setting of heritage assets or areas of special character, boroughs and neighbourhood planning groups should look to utilise alternative typologies (rather than towers) and set appropriate height parameters.

4.5 Locations where tall buildings may be appropriate

- 4.5.1 **Policy D9 (Tall buildings)** in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in principle, subject to meeting the other requirements of the Plan. Having identified potential areas of change and area-wide visions, policies and sets of parameters (or design codes) for these areas (see section 4.5), boroughs should conduct a tall buildings evidence base and sieving exercise to determine if and where tall buildings may be appropriate.
- 4.5.2 To support the justification and effectiveness of the local plan and ensure robust implementation at the planning application stage, boroughs should assess each area for whether it includes locations where tall buildings may be an appropriate form of development, and if not, the potential visual and cumulative impacts expected to arise from tall buildings in those locations. This sieving exercise should draw on the evidence provided by the characterisation analysis as well the rationale for the area-wide visions. As a result, boroughs should first assess and identify where tall buildings would cause harm and use this as a basis for deciding upon which areas are potentially suitable for tall buildings. The evidence base and sieving exercise should include the following steps.

Step One: Sensitivity assessment

- 4.5.3 A sensitivity assessment should be carried out to identify locations where tall buildings would be inappropriate through an assessment of harm. Boroughs should use the list of criteria in Table 4.2 to map the areas that each criterion cover and combine them into a single map (boroughs may wish to add additional criterion if necessary). This will assist in identifying the areas' sensitivity to tall building development.

Table 4.2 Sensitivity to tall building development criteria

Sensitivity to tall building development criteria	
1) Areas that do not have any buildings that exceed the borough's tall building definition	6) Within Green open spaces and nature reserves
2) Within or near Areas of Special Local Character	7) Close proximity (for example, 50m radius) or within the setting of listed buildings
3) Within a Conservation Areas or likely to affect its setting	8) Poor levels of public transport accessibility (for example, PTAL score 0-3)
4) Within a protected view or its background	9) Within the Thames Policy Area
5) Within Green Belt or Metropolitan Open Land	10) Within the setting of a World Heritage Site
	11) Within a Civil Aviation Authority Public Safety Zone

- 4.5.4 Boroughs should then assess the potential harm of tall buildings within these locations identified. Where harm is identified that indicates that tall buildings are not an appropriate form of development, these locations should be

discounted and the harms documented for inclusion in the growth strategy and local plan. Information on harm will be important for development management decisions if tall buildings are proposed in these areas.

Step Two: Alignment with area-wide vision

4.5.5 Next, boroughs should align areas of their borough with their area-wide visions and policies (see Section 4.5). In areas where the area-wide vision and policies do not envision tall buildings, the harms should be documented, and alternative typologies should be planned for. Mid-rise developments can often offer an optimum design solution in areas where tall buildings are not envisioned. Mid-rise developments are also more suitable for families with young children as there are greater opportunities for easy access and surveillance of children’s play space and amenity space. An example of where a mid-rise design solution has been accepted over a tall building is shown in Figure 4.8.

Figure 4.8 Development Land and Site at 1 Hook Rise South, Surbiton planning applications, Royal Borough of Kingston upon Thames

	
<p>18 storeys - 705 dwellings Refused (2016)</p>	<p>10 storeys – 950 dwellings Approved (2018)</p>

4.5.6 In areas with existing tall buildings, an assessment should be made as to whether further tall buildings (including the redevelopment of existing tall buildings) may be appropriate. This should follow the same process as above using the area-wide vision as a basis for this assessment. For instance, in areas where the low or mid-rise built form is a positive characteristic which aligns with the area-wide vision, but which have an existing tall building/s, these are likely to be discounted as appropriate for tall buildings. These are likely to be isolated point blocks. An example for such as area is shown in Figure 4.9. The harm of further tall buildings in these areas should be clearly set out.

Figure 4.9 Location where the mid-rise built form is a positive characteristic and an existing tall building is not justification for further tall buildings.



- 4.5.7 If an existing tall building is considered acceptable in principle to be redeveloped as a tall building it should be identified in the development plan and maximum acceptable height should be specified.
- 4.5.8 In locations that have been identified as potentially suitable for tall buildings in their area-wide vision and policies, and that do not cause harm to the character of the local area (under step one and two), these areas should be taken forward to the suitability scoping exercise step below (step three).

Step Three: Suitability scoping exercise

- 4.5.9 Having discounted areas of the borough where tall buildings are inappropriate for development due to an assessment of harm, boroughs should assess the remaining areas (see map on left in Figure 4.10). Boroughs should determine the sensitivity of these areas to tall buildings and only identify areas where tall buildings will contribute positively to the character of an area.
- 4.5.10 Visual impact assessments through the use of 3D modelling software may be necessary in identifying any potential impact or harm. This should include an analysis of sensitive long, medium and immediate views. Boroughs should pay close attention to its location in respect to conservation areas, strategic views and London's World Heritage Sites. The greater the height of a tall building the wider the area that the building will be visible and thus the wider the area that will need to be taken into consideration.
- 4.5.11 For boroughs that apply a lower tall building definition than 30m in height, there are likely to be many more locations where tall buildings may be an

appropriate form of development, including areas with good public transport accessibility (in accordance with Policy D3 B). This will be a more extensive exercise than the example given in Figure 4.10 which is based on a 30m definition.

Step Four: Define maximum heights

4.5.12 Once locations where tall buildings may be appropriate have been identified, the maximum heights for these locations should be determined and identified on maps in Development Plans. Locations and maximum heights should be defined as precisely as possible, preferably on digital online maps, to provide as much clarity as possible to the local community, landowners and applicants. The level of detail that boroughs produce on the location and heights of tall buildings will vary. In some cases, it may be appropriate to identify broad locations (see map on right in Figure 4.11) while in others, a more detailed approach may be necessary which is informed by the area-wide parameters (see Figure 4.11 and Figure 4.12).

Figure 4.10 The sieving exercise should identify locations inappropriate for tall buildings (map on the left) and result in the final mapping of locations and maximum heights where tall buildings may be appropriate

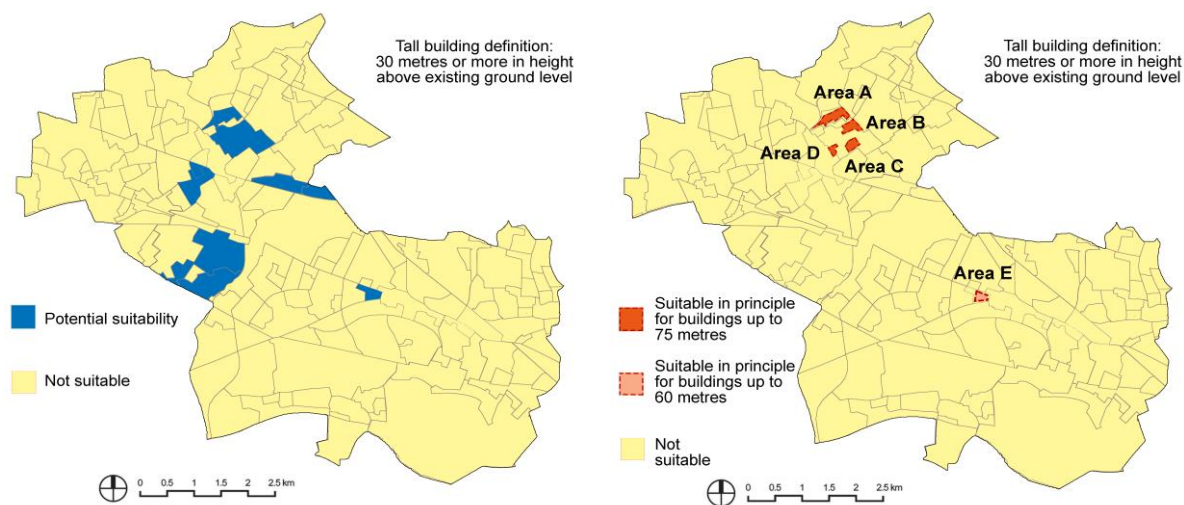


Figure 4.11 Detailed height parameters for 'Site A' where tall buildings may be appropriate subject

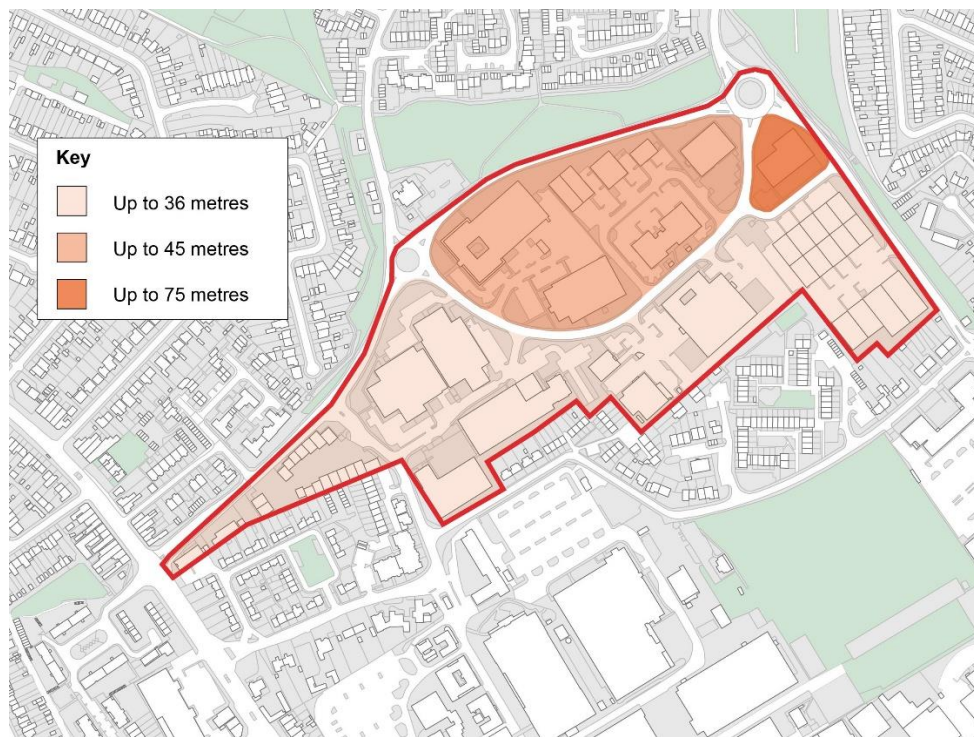


Figure 4.12 Boroughs are recommended to provide further detail on block locations and heights where necessary



4.6 Application of a characterisation and growth strategy

- 4.6.1 A characterisation assessment and growth strategy should inform the spatial strategy within the Development Plan or neighbourhood plan. It should also inform development of area-based policies within the local plan, area-based development plan documents or area-based guidance. Where it has been jointly developed with a neighbourhood planning group, it should also inform any neighbourhood plan. It is likely that development of the growth strategy will form part of the statutory consultation for the development plan document or Supplementary Planning Document².
- 4.6.2 The characterisation assessment and growth strategy should also inform the design, scale and massing of development sites within the local authority area, town centre strategies, heritage strategies, housing and economic land availability assessments and the housing requirements for designated neighbourhood areas.

Area-wide small site design codes

- 4.6.3 The characterisation work, and in particular the identification of character types, should form the basis of a small site design code. These area-wide design codes aim to provide clarity and certainty on the design and quality of small site residential development (sites up to 0.25 hectares). For further information on this process, please see the [Small Site Design Codes LPG](#).

Design-led approach to larger site

- 4.6.4 While a characterisation and growth strategy should inform the development of all sites within the local authority or neighbourhood area, it will be particularly useful when determining the indicative site capacity of larger site. The capacity testing and future redevelopment of these sites should follow the design-led approach. For further information on this process, please see the [Optimising Site Capacity: A Design-led Approach LPG](#).

² For a local development plan document, this is Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. For Supplementary Planning Documents this is Regulation 13 of The Town and Country Planning (Local Planning) (England) Regulations 2012. For Neighbourhood Plans this is Regulation 14 of The Neighbourhood Planning (General) Regulations 2012.

Appendix 1 London Historic Character Thesaurus Historic

A1.1.1 Boroughs and neighbourhood planning groups should follow the approach set out in the [LHCT user guide](#) to collect and record the character types with their boundaries. As outlined in the LHCT, characterisation is most meaningful when analysed through a historic dimension or lens. Historic characterisation has several key principles which underpin the way in which it approaches understanding and mapping the landscape. These are outlined in Appendix 2.

A1.1 Scale and resolution of data collection

A1.1.1 A list is contained with the LHCT of all the character type terms which have been developed for Greater London along with scope notes that explain what each term covers (Appendix B of the document). These are broken down into three levels (e.g. broad, intermediate and narrow) in which the narrow level should be predominantly used when collecting and recording the character types. It may not be necessary or possible to identify the character type of every single building, however, boroughs and neighbourhood planning groups should aim to identify areas where there is a predominant character type. The intention is that this analysis should be carried out at scales below that of neighbourhood, i.e. several urban blocks. Defining the character type/s of finer grain areas such as town centres and the Central Activities Zone (CAZ) may take more time than in areas of recurring urban form (such as outer London suburbs for instance). For these areas, previously commissioned character studies or appraisals may be useful when identifying the character types.

A1.2 Common character types

A1.2.1 To assist in defining the character types within an area, some of the most common character types have been included below in Figure A1.1. Images of these types have been included for ease of use and identification. Buildings which are the same character type but differ in height should be differentiated from each other. For example, the 'basic terrace' character type may include terraces of two or three storeys etc. and these should be differentiated between. It is also encouraged, where possible, to differentiate between large areas where the built form of the same character type differs in architectural detailing or form. For instance, the images below show two two-storey terraces that differ in architectural form and roofline. This differentiation will assist in the development of area-wide design codes (see Small Site Design Codes LPG).

Figure A1.1 Examples of common character types

Examples of Metroland Estate character type:



Examples of Basic Terrace character type:



Examples of Mid Rise Block character type:



Examples of Block Dwellings character type:



Examples of Shopping Street character type:



Appendix 2 Characterisation – Key Principles

A2.1.1 Key principles of historic character³ are:

- i. That all of the landscape is historic, i.e. influenced by the direct and indirect actions of people. This includes apparently natural areas, such as woods, rivers and marshes, since these are always influenced in some way by human action.
- ii. Historic characterisation is a 'complete coverage' approach; the whole of the area under consideration, not simply the obviously noteworthy components, is to be characterised.
- iii. The character of an area, known as its 'current character' is recorded by analysing it and breaking it down into smaller areas which share a coherent developmental history. These are then ascribed to 'character type' terms.
- iv. Previous character is recorded where it either influences current character (e.g. a recent housing development is the shape it is as it occupies the site of a former factory) or is important to understand the evolution of an area (e.g. a former dockland where docks have been infilled and can no longer be appreciated on the ground but has still conditioned the overall development of the surrounding area, including factors such as the layout and shape of streets).
- v. There is no inherent 'value' ascribed in the terms used for characterisation. Understanding of the value of areas or character types comes from analysing them and understanding their evolution, context and survival.
- vi. Character type terms do not normally embed information on date in the term name. Many types are not explicitly tied to a specific period (e.g. terraced housing, wharves) but also as greater flexibility in analysis can be achieved by recording date of origin as a separate attribute.

³ As outlined in the London Historic Character Thesaurus (2021)

Appendix 3 Assessment criteria

A3.1.1 Boroughs and neighbourhood planning groups should use the following criteria to assess the design quality, social and cultural significance, sensitivity to change and opportunity for growth of each character area identified. It should be noted that the design quality criteria have been based on the ten characteristics of a well-designed places set out in Part 2 of the National Design Guide.

Table A3.1 Quality and sensitivity assessment criteria

Sensitivity to change	Opportunity for growth
<ul style="list-style-type: none"> Heritage – Near or within of a concentration of heritage assets including listed buildings, local heritage assets, buildings at risk or recently lost buildings of merit, or otherwise likely to affect their settings.. Historic character – Near or within an area of archaeological value or historic importance, the setting of a World Heritage Site, conservation area, or the setting of high quality and significance townscape features. The quality, extent and variety of architectural periods evident and consistency of style. High quality materials, detailing and surface treatment. Evidence of a historic urban grain and street pattern still intact. The concentration of high-quality green spaces, parks, gardens, mature street trees and other rich and varied biodiversity. This may include the presence of registered parks and gardens. Policy protections – Presence of green belt, MOL, industrial land, protected gypsy and traveller sites or other protection policy designations including neighbourhood plans. The range, quality, age and use of materials, detailing and surface treatment evident 	<ul style="list-style-type: none"> Existing urban form such as density, height and urban grain Existing high PTAL and connectivity Planned or current infrastructure improvements including improvements to PTAL and connectivity Amount and extent of development sites/ areas (either in pipeline, planned or prospective) Regeneration projects and initiatives in place or planned Identified as an Opportunity Area, growth area or regeneration area Recent development pattern and past levels of growth (likelihood this will continue) Planning policy constraints limiting capacity for growth e.g. Metropolitan Open Land or London Heathrow Airport Public Safety Zone
Sensitive to change	Low opportunity for growth
Somewhat sensitive	Medium opportunity for growth
Not sensitive	High opportunity for growth

Design Quality	Social and cultural significance
<ul style="list-style-type: none"> Context – A distinct sense of place that relates well to its surroundings and responds to local heritage, history and culture. Identity – An attractive and distinctive place with well-designed places and buildings. Built form – A coherent pattern of development with appropriate building, spaces, layout, orientation, scale, form and appearance. Movement – A well-connected place that is easy to access, move through and around by walking and cycling and all modes of transport Nature – A place that enhances and celebrates its natural features, has a pleasant microclimate and is rich in biodiversity. Public spaces – Indoor and outdoor public spaces that are safe, social, welcoming, attractive and comfortable to spend time in Uses – A diverse, inclusive and stimulating environment offering a range of uses, experiences and choice. Homes and buildings – Functional and attractive homes and buildings that are fit for purpose and have good access to external amenity and public spaces Resources – Efficient and resilient buildings and places Lifespan – A place with a strong sense of stewardship, that is made to last and can easily adapt future needs and lifestyle demands. 	<ul style="list-style-type: none"> Intangible assets – Presence of positive intangible characteristics that make a place unique or distinctive and which foster a sense of belonging and identity. Cultural assets – Presence and significance of attributes, spaces and activities that celebrate a places artistic, historic, cultural and creative character. Community assets – Presence and significance of highly valued community uses, spaces, services or infrastructure that meet the needs of the local community. Local features – Presence and significance of physical features that are unique and that have local significance and meaning (e.g. public art, murals etc) to the local community. Health and wellbeing – A place that encourages active travel and has overall positive benefits for the mental and physical health and wellbeing of Londoners. Need and deficiency – A place with a wide range of economic opportunities, where the benefits of economic success are shared equitably. Demography and density – Sustainable densities supported by sufficient levels of infrastructure and access to amenities Employment – A place with a strong and diverse range of employment opportunities. A place with a range of sizes of businesses units and affordable workspaces. Town centres and high streets – Presence of a vibrant town centre or high street that provide varied economic, civic and cultural offers throughout the day and night. Education – Presence and significance of high-quality and renowned educational and training facilities. Housing types and tenure – A place with a variety of housing suitable to the needs of diverse communities, including affordable housing. Best use of land – Presence of successful places that make the best use of well-connected land. Low presence of unsuccessful, underutilised and poorly managed land. Safety – A place that feels safe, secure and inclusive. Well-lit, good passive surveillance.
Successful	High significance
Some success	Moderate significance
Not successful	Low significance

