

JUST SPACE COMMENTS ON DRAFT NEW LONDON PLAN
2nd March 2018

Just Space is a community-led network of voluntary and action groups influencing plan making and planning policy to ensure public debate on crucial issues of social justice and economic and environmental sustainability.

Operating mainly through mutual support among member-groups but also through sharing of information, research and resources, we are now active at neighbourhood, borough and London-wide levels. What brought us together was a need at the city-wide level to challenge the domination of the planning process by developers and public bodies, the latter themselves heavily influenced by property development interests.

To us, the planning system pays only lip service to the commitment to community participation: the gap between policy and practice is immense where democratic engagement is concerned.

In response, the Just Space network has, over the last eleven years, brought together and nurtured a huge amount of experience and know-how from London's diverse community organisations.

In 2015 Just Space and its member-groups began to prepare contributions for a completely new London Plan which was going to be needed and commissioned by the new Mayor. A series of Conferences and working groups brought together contributions from 85 community organisations. This led in August 2016 to the publication of [Towards a Community-Led Plan for London: Policy directions and proposals](#), which has been discussed at a number of roundtable meetings with the GLA.

In 2017 Just Space, supported by staff and students at UCL, prepared 4 new policy documents which were launched for public discussion at City Hall on 20th January 2018. [Land Reform](#), [Health Policy](#), [Industrial Strategy](#) and [Social Impact Assessments](#) have informed our deliberations on the draft new London Plan. However, this submission is informed most of all by the involvement of very many community organisations at 3 conferences on the London Plan co-ordinated by Just Space with the support of others: London Plan Community Event 20 January 2018 at City Hall, London Plan Equalities Event 5 February 2018 at City Hall, Working Conference on London Plan 24 February 2018 at UCL.

Chapter 0 introducing the Plan

Local Circumstances:

National Planning Policy Framework para 10 says that plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. The current London Plan (para 0.14 2016 as edited 2017) recognises 'local circumstances' as..."Given this consistency, he [the Mayor] considers that the London Plan can be seen as the expression of national policy for London, tailored to meet local circumstances and to respond to the opportunities to achieve sustainable development here. These views informed the early alterations referred to in paragraph 0.16B, and they were upheld."

However, the proposed Plan relegates the application of 'local circumstance' to the adjusting of policy by boroughs to suit localities. The Mayor has surrendered the ability for London, through the new London Plan, to exercise a greater degree of self- determination in plan-making to achieve London-wide policies that are more closely aligned with the needs, aspirations and conditions appertaining to London and Londoners. This is a missed opportunity of importance. For example in the adjudicated plan-led system of the UK, 'local circumstances' and policy, if well evidenced, is recognised by Government, the Appeal Court and PINS and can secure, say, "affordable housing" from small sites (10 homes or less) notwithstanding a Written Ministerial Statement to the contrary. Therefore, 'local circumstances' is a potentially important opportunity that the Mayor is not availing us of: a retrogressive step.

Little Recognition of Neighbourhood Planning

The Plan gives virtually no recognition to neighbourhood planning. It is now an active and popular level of planning that is part of the Development Plan. National Planning Policy Framework para 184 explains that neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. And the current London Plan does recognise that communities, local business organisations etc. have particular contributions to make to planning decisions, plans and strategies to shape neighbourhoods and the Mayor will support their involvement (para 8.4). The Mayor is again not availing us of an opportunity to progress planning in London that meets the needs, aspirations and conditions of Londoners.

Planning for people

Para 1.1.1 states that "planning for good growth means planning for these communities – both existing and new – helping them to flourish and making new connections between them". This is unfortunate as it can be read that planning is a top-down exercise done for people and not a collaborative venture with and by people. This in-exactitude does not make an appropriate start for the Plan and the intent that lies behind it.

Integrated Impact Assessment

Having regard to the Just Space analysis of the Integrated Impact Assessment (IIA) for the London Plan that appears elsewhere, Just Space considers that the IIA is not fit for purpose and that substantial further work should be undertaken on it before the Examination in Public. Otherwise, plan-making is put at risk.

We have the following grounds for viewing the IIA as unfit for purpose:

1. Non-availability of accessible formats
2. It fails adequately to evaluate the key alternatives available to London and the London Plan Process.
3. The timing of the IIA prevented it from genuinely informing the gradual evolution of the Plan
4. The handling of the analysis is deficient in crucial respects

Chapter 1 Planning London's Future (Good Growth Policies)

Chapter 1 provides an essential opportunity to set out an integrated approach to meeting London's current and future needs in a way that reduces socio-economic inequalities, ensures economic fairness, increases health and wellbeing, all within environmental limits.

The Just Space *Towards a Community-Led Plan for London*¹ puts forward a vision for London's future and specific policy proposals to support these objectives and achieve sustainable development. Through the Integrated Impact Assessment process, Just Space has also produced alternative options for the Good Growth policies and spatial development vision². The comments below summarise key principles and suggestions in these documents, highlighting important aspects that are missing from the Good Growth policies.

The introductory paragraphs to the Good Growth chapter present a range of assumptions which need to be carefully unpacked and debated.

Definition of “All Londoners”

The first assumption refers to who the London Plan is for, who is part of London's future. The term 'Londoner' is used throughout the Plan with no definition or explanation of who it includes. The term could be defined simply by 'people living or working in London', however a more complex understanding is necessary to give recognition to the whole range of women's and men's lived experiences, their contributions to shaping the city over the course of history, their multiple and intersecting social identities, diverse needs and aspirations, social, cultural and community networks.

Across many of its chapters the London Plan hints at an emerging Londoner profile which is perhaps that of a young professional commuting into the Central Activities Zone, with sufficient income to afford the London Living Rent or shared ownership, make healthy food choices, enjoy cultural events, and also have the time and resources to participate in civic life.

Many of London's communities would not feel reflected by this identity. For example those who have never been considered part of the global city economy (e.g. the working class, those in low income and precarious work, those involved in the everyday, foundational and informal economy etc); those who are time-poor due to having multiple jobs, caring responsibilities, long commutes; those who have been isolated from their family, social and community networks or displaced outside of London due to the housing crisis and increasing living costs; those whose values and cultural norms are not

¹ <https://justspacelondon.files.wordpress.com/2013/09/just-space-a4-community-led-london-plan.pdf>

² <https://justspace.org.uk/next-london-plan/community-alternative/>

usually represented in public life and institutions; those who are restricted from accessing basic facilities like healthcare through identity checks and upfront charging, for example migrants and refugees who may also face cultural barriers.

It is essential to make explicit that the term Londoner includes migrants, and given the impacts of Brexit we look to the Mayor to be a champion for all Londoners and to elevate groups who are being excluded from what London has to offer. “All Londoners” must be explicitly defined in the London Plan and every one of the Mayor’s Strategies to include Londoners without documented legal status and must take full account of where multiple identities cause an omission of a duty of care to those who are most vulnerable in society. We would welcome the opportunity for an open and inclusive discussion on this topic.

Low-income households

A second related point refers to the assumption that the proposed development model can ‘work for everyone’ and reduce inequalities. However an important issue such as rising poverty gets very limited mentions in the London Plan, despite being highlighted as a concern in the Mayor’s vision document ‘A city for all Londoners’. We would like to see the concerns and interests of low income households put at the forefront of the London Plan as a key priority and we make a number of suggestions drawing from the work of the [**New Policy Institute**](#) and [**Taxpayers Against Poverty**](#).

If the London Plan is explicitly designed to address the needs of low income households, it will be more likely to be successful in meeting the Mayor’s commitments to fairness, more likely to ‘work for everyone’ and deliver sustainable development across its social, economic and environmental dimensions. Low income, and especially working households are not only short of money but also pressed for time, due to caring responsibilities and part-time jobs. As a result, they: are cost sensitive; have higher dependence on and more interaction with local public services; have more local, varied and unpredictable travel patterns; have a larger stake in the local area³. To address this we suggest further changes to Policy GG1 Building strong and inclusive communities, and to other policies throughout the Plan.

Community Participation in Planning

Finally, we are concerned by the assumptions in the introductory paragraphs that only planners, planning applicants and decision makers are involved in shaping London’s growth and development. There is a significant omission in not recognising and supporting the role of London’s diverse communities in planning – for example in ensuring evidence and impact assessments are robust and reflect the whole range of experiences and needs on the ground, in developing visions for the future of their area and the whole city which are

³ As highlighted by the New Policy Institute in their work on the [London Poverty Profile](#)

based on these needs, in influencing policy formulation, in the implementation of policies and decisions and their monitoring. This also needs to take into account the full extent of what makes up local communities – not just residents, but also businesses, enterprises, organisations and service providers with a stake in the local area. To address this shortcoming we make a number of proposed changes to Policy GG1 Building strong and inclusive communities. In addition, the first sentence of each of the Good Growth policies should be amended to:

.... those involved in planning and development, which should incorporate inclusive local community participation...

GG1 Building strong and inclusive communities

The key theme that is missing from this policy is that of ensuring the inclusive participation of diverse communities in planning and development. This is mentioned in the supporting text (1.1.5) but should be made an explicit requirement.

Interaction and participation will play an important role in building a city where all play an active part in the decisions that affect them. They will give voice to the diverse needs across London's communities, particularly the needs of those under-represented or completely excluded, and make a significant contribution to the reduction of social and economic inequality.

Neighbourhoods that are healthy and inclusive will have facilities, amenities and community spaces that are accessible and affordable to everyone, now and for future generations. These spaces are highly valued for the opportunities they provide for social interaction, community networking and empowerment and in every neighbourhood they will be audited.

Engagement with communities will be a meaningful and continuous process, with real opportunities for co-production.

The definition of inclusive communities should come from the bottom up, from the lived experiences of people and groups. This should include not only residential communities and groups protected under the Equalities Act, but also local businesses, social enterprises and other organisations which are part of London's neighbourhoods.

The GLA should facilitate more ways and resources for groups and networks to meet, around particular issues and cross-cutting issues. The GLA should support communities to map out their assets, networks and relationships as well as good practices and good work that's being done on the ground by community groups and organisations.

It is essential to make plan-making and planning decisions more accountable and everyone should be involved in these processes, in line with the

proposals in the Just Space 'Towards a Community-Led Plan for London' chapter on Public Participation and Community Involvement in Planning.

Case study: Haringey

Haringey has a 65% non-White-British population, 70% of young people from minority communities, is the 5th most deprived borough in London and the 30th most deprived in the country, has 100 languages being spoken. There is the Haringey Development Vehicle and the United Nations taking up the case of the Latin American community, the Pueblito Paisa café in Seven Sisters and Wards Corner, a campaign which has been going on for 10 years. The Tottenham Community Centers Network is trying to ensure that local centers have affordable rent that can actually serve the needs of communities in Tottenham. There is also the Our Tottenham Group which is a coalition of over 60 groups coming together.

This is just an example of what is happening across London. There are organisations, coalitions and groups campaigning around the access to community space, whether it's shops or parks or community centers and for us it is crucial that this is reflected in the London Plan and that we continue to work together for communities in terms of inclusiveness. Building stronger, inclusive communities in Haringey and the whole of London is imperative but from what we've seen so far local authorities might not be able to do that. The new London Plan must provide sufficient guidance and advice as to what it really means in practice. Evidence should be collected on the impacts of what has been happening so far, the loss of community spaces and local facilities, but also in terms of the good work that is being done by community groups, in order to develop good practice guidance for those involved in development and planning.

Changes to the policy:

Introduce new points:

- ensure full public participation and scrutiny of planning decisions, Local Plans, Opportunity Area Planning Frameworks, the London Plan etc, from the early stages through to implementation and monitoring. This should be done in line with the policy proposals made in the Towards a Community-Led Plan for London (p.14): a Social Compact with Londoners, producing a Mayor's Statement of Community Involvement, resourcing by the Mayor to facilitate the informed involvement of communities and user groups, deep changes in governance in relation to London planning and decision making
- identify resources and support to enable a wide range of interests to participate, taking into account the particular needs of different groups

Point A –ensure that London’s economic and other opportunities are taken up and reflected in equal outcomes first of all for low income households and those who face socio-economic disadvantage or exclusion ...

Point D – Promote the crucial role of town centres, high streets and neighbourhoods..

GG2 Making the Best Use of Land

The key theme that is missing from this policy relates to sustainable development, across its social, economic and environmental dimensions. We challenge the assumption at the heart of this policy regarding how the ‘best use’ of land is defined. In the community-led alternative option put forward as part of the Integrated Impact Assessment process⁴ we have argued that **Lifetime Neighbourhoods and Lifetime Suburbs** should be central to achieving sustainable development. We consider the principles underlying Lifetime Neighbourhoods to be the adequate criteria for defining and measuring ‘best use’ of land.

Lifetime Neighbourhoods provide a framework for sustaining and developing sustainable communities and a place-based or spatial focus for mobilising resources to ensure inclusive community participation and community-led planning. They are places that meet the needs of the local community at all stages in their life. Their principles recognise and value health and well-being, social networks, thriving local economy and sustainable environment. These include, as defined by the London Tenants Federation: communal spaces, facilities, services and activities — well run, accessible, affordable and relevant to all; homes that meet our needs; good consultation, democratic accountability and empowerment of communities. A full description is provided in the Towards a Community-led Plan for London Implementation chapter⁵. We welcomed the introduction of the Lifetime Neighbourhoods policy in the 2011 London Plan and we strongly argue it is essential for this to be included in the new London Plan.

The London Plan is based on predictions of massive growth until 2041 which is a long time ahead, yet it hasn’t tested different scenarios or alternatives. It is based on this massive prediction of growth that we are being asked to accept densification and intensification, which may have serious effects on the way of life of the current population living and working in London. Already, a great deal of space in London has been taken up by developments that do not serve the needs of Londoners. In regard to Opportunity Areas, although Just Space has repeatedly asked for this, no analysis has been done of their effects on the homes and jobs of the current London population — especially

⁴ <https://justspace.org.uk/next-london-plan/community-alternative/>

⁵ <https://justspacelondon.files.wordpress.com/2013/09/just-space-a4-community-led-london-plan.pdf>

the fact that many have been forced out of the Opportunity Areas mainly through the development of expensive housing.

Organising development and shaping growth should be done in ways that meet the needs and aspirations of the people and communities of London in an inclusive, fair and sustainable way, coordinated with development beyond its boundary. New models of development and regeneration will prioritise social sustainability and social infrastructure; the protection of existing settled communities to support Londoners' attachment to place and sense of belonging; delivered to achieve the decent homes, densities, place-making and sustainable development needed by —and sensitive to— communities and localities.

A more sustainable pattern of development will be achieved through a greater recognition of a more polycentric geography for London; together with rebalancing employment and housing demands to protect and enhance diverse workspaces and the localised economy; lifetime neighbourhoods and, in outer London, lifetime suburbs, providing many key activities and facilities locally, reducing the need to travel; a crucial role for active travel and public transport, including orbital and smaller scale investments; and meeting challenging environmental limits, targets and opportunities. Implementation with clear impact evaluation and monitoring will optimise delivery.

Key land use policies (especially those governing densities and essential social & affordable housing provision) will be made firmer (less flexible, less negotiable) to give greater certainty in the land market: specifically aiming to ensure that developers don't pay more for sites than is consistent with meeting development plan requirements.

Changes to the policy:

The first sentence should be changed along the lines of:

To achieve sustainable development that meets the needs of communities now and for future generations...

Introduce new points at the forefront:

- best use of land will be measured in terms of socio-economic and environmental value, not just financial viability.
- plan for more dispersed patterns of development, in order to achieve inclusive and well connected Lifetime Neighbourhoods and Lifetime Suburbs
- prioritise the protection of existing uses that meet the needs of local communities

Point A – Delete the word ‘prioritise’. Development in Opportunity Areas etc must not displace existing resident and business communities, social infrastructure, networks and other assets that are valuable to people who live and work in these areas

Point C – this should include local economic audits and socio-economic impact assessments

Point D – add: and support the productive use of green spaces for food growing

GG3: Creating a Healthy City

The key theme that is missing from this policy relates to ensuring that plan making and planning decisions are based on detailed and inclusive evidence of multiple and intersecting health inequalities to support an integrated approach. We propose this is achieved through **Joint Strategic Needs Assessments**.

A healthy city is one where everyone enjoys a healthy urban environment to live, work, learn and play, regardless of their income, their background, or the part of London they live in.

The London Plan’s policies must act to bring air pollution down to safe levels, while encouraging active travel by making it safer and pleasanter to walk and cycle in the city. In practice, this includes:

There is strong evidence that people with better access to the natural environment are less prone to mental illness. Access to green space may also increase physical activity. The London Plan must mandate boroughs to ensure that everyone in London is no more than 5 minutes’ walk away from high-quality nature, and maintain the current policy of ensuring that no one is more than 10 minutes from a local park or open space.

Planning policies can have a significant impact on access to healthy and unhealthy food. Furthermore, the London Plan must require that all new developments improve local residents’ access to affordable fresh healthy food, or at least maintain it where this access is already good.

Changes to the policy:

Introduce new points:

- § Reduce the need to travel by continuing to encourage development which contributes to lifetime neighbourhoods

- § Not allow any new roads in the capital, and restrict any new river crossings to those reserved for public transport, walking and cycling.
- § Widespread pedestrianisation of central London and local town centres, and provision of safe walking and cycling infrastructure along roads
- § Ensure that new schools, care homes and hospitals are not built near main roads
- § support and resource a community development approach to addressing health inequalities
- § support social prescribing through protecting and enhancing existing community and social infrastructure

Point A – include a requirement for Boroughs to conduct inclusive Joint Strategic Needs Assessments to support their plans and strategies. One of these wider determinants is the issue of housing. There is currently a huge mismatch between the kinds of homes that London needs and the ones that are being built and as a result, commuting worsens and the city becomes more socially polarised. New homes must be built at a height and standard of design utilising stable building materials and techniques, energy and water conservation measures, and provisions for refuse recycling. These residential areas should also have access to green spaces given their role in promoting physical and mental wellbeing.

Point C – we suggest that this policy might be strengthened by addressing the balance of land given over to private vehicles (cars and lorries) versus other uses of land to make London streets greener and more pleasant.

Point D – this should include social, cultural and gendered aspects of health, across diverse groups. Also, with 10,000 premature deaths in London linked to air pollution, it is essential that these assessments consider air quality and the measures needed to improved this and secure good quality air for all. We don't feel that these policies go far enough and we feel that action needs to be taken quicker to address this urgent health crisis.

Point G - by supporting healthy and affordable food businesses on high streets, markets, town centres, as well as ensuring sufficient space for community-led food growing

GG4: Delivering the homes Londoners need

The key theme missing from this policy is that of prioritising meeting identified housing need for social rented homes and homes that meet the whole range of specialist needs. We make a number of proposals here and in more detail in the comments related to the Housing chapter.

The London Plan should prioritise the delivery of not-for-profit rented homes, including social rented and community-led housing, particularly on land owned

by the GLA Group, Local Authorities and other public bodies. The term “affordable” is still being used although both the London Tenants Federation and Just Space have repeatedly asked that it stopped being used because of its lack of genuine meaning. Homes aimed at households with a household income of £90,000 or £60,000 are not genuinely affordable to a London population where the mean household income is £39,000 and that of people already in social housing is £17,500. There appears to be a gross mismatch as the housing in these ‘affordable’ categories is not even affordable to those on middle incomes let alone those on lower incomes.

All new homes should be energy positive, built to lifetime home standards and provided at densities which are sensitive to the diverse needs of London’s communities and take into account social and green infrastructure, as well as affordable access to public transport, as part of Lifetime Neighbourhoods and Lifetime Suburbs. Caring for all existing homes and communities should be prioritised through investment in energy efficiency infrastructure and sustainable retrofitting and adaptations. Not-for-profit homes must be protected from loss through redevelopment.

The delivery of new homes and measures to protect and improve existing homes will apply across the whole range of housing types and sizes, with steps taken to increase provision where there is evidence of consistent shortage and poor living conditions. These processes will ensure the full involvement of all London’s communities in housing decisions, supporting capacity building for social tenants, private renters and groups with specialist needs.

Changes to the policy:

The first sentence should be changed along the lines of:

To ensure that everyone across all household sizes, income levels and specialist needs is able to live in all parts of London in secure, high quality homes they can afford...

New points should be added:

- prioritise the protection of existing not-for-profit homes and retrofitting and adaptations to ensure energy efficiency
- ensure the participation of London’s communities in housing decisions in line with the proposed changes to Policy GG1

Point A – should be changed to: Ensure new homes are delivered to meet the full extent of backlog, current and future housing needs, as identified in the SHMA and other evidence-base documents

Point B – should set a target for social rented instead, and refer to targets for family homes and specialist accommodation

Point C – Support diverse and inclusive communities

GG5 Growing a good economy

The key theme missing from this policy is the link to the Mayor's economic fairness agenda, the vision set out in A City for All Londoners and the objectives to reduce inequalities (for example 1.0.7). We propose a different framing of how London's economic success is defined and how it translates in planning and development and more detailed comments under the Economy chapter.

The economy of London should be managed in ways which foster the reduction of inequality, especially of in-work poverty, sustaining London's production of goods and services valued by its citizens, by the rest of the UK and for export. It will, in particular, foster and nurture the sectoral and ethnic diversity of economic activity in the interests both of robustness and fairness, paying attention to the social and environmental value of activity alongside private profitability. Growing activity is to be expected in greening the economy, in attending to the safety and environmental performance of the building and vehicle stocks and in moving towards a more circular economy.

Land use and transport powers should be used alongside powers to manage and influence education, training and skills through the LEAP and alongside the procurement and employment powers of the GLA Family. Aims there will be to reduce the discrimination against SMEs and ethnic and other minorities (including the disabled), extend the implementation of the London Living Wage and foster good jobs with security and progression prospects, halting the drift towards casual and insecure work which are the source of so much in-work poverty.

Land use planning will be grounded in a much closer understanding of the social, environmental and interlocking economic value of public and private enterprises across all sectors and localities. This is especially important in respect of Opportunity Areas, Housing Zones, land in and behind High Streets and other localities subject to planned development policy designations by the Mayor and Local Planning Authorities (and in major development applications). In these cases social impact appraisals will be made in advance of decisions, evaluation criteria including the effects of change on jobs being lost as well as gained, travel and emissions impacts and cultural effects. To

this end the Mayor will support and strengthen community and employer organisations in their contribution to understanding and policy-making.

Changes to the policy:

The first sentence should start with: 'To protect and support London's everyday economy/diverse local economies ...'

Introduce new points:

- ensure that the success of London's economy is measured in different terms: to deliver human wellbeing and address growing inequalities, all within environmental limits. These should be linked to Key Performance Indicators for the London Plan and the Economic Development Strategy.
- ensure that planning decisions and plan-making are based on evidence of the contribution of London's diverse local economies, the interconnectedness between activities and sectors and the particular needs of businesses
- support all London's diverse economic activities and sectors to become greener
- protect and enhance land uses and activities that play a significant role in the transition to a circular economy (e.g. recycling, repairs)

GG6: Increasing Efficiency and Resilience

The key theme missing from this policy is that of achieving socio-environmental justice, not just the transition to a zero carbon city. This means ensuring that low income households and those who are the most disadvantaged are prioritised in being involved in and benefitting from efficiency and resilience improvements, in recognising that they are under-resourced and therefore more likely to face higher risks.

Integrating and delivering on environmental, social and economic goals, to live within environmental limits and a just society that is more resilient to changing circumstances, including extreme weather events and climate change. Strengthening targets in the light of the Paris Agreement 2015, to move away from fossil fuels and fuel poverty by scaling up retrofitting, increasing energy efficiency and renewables, within systems that are democratically controlled locally.

It is essential to ensure stewardship of the environment in which biodiversity/nature and community food growing can thrive. Applying the principles of a circular and sharing economy where waste is purposefully used and reused as a resource to maximise the green economy and minimise adverse environmental impacts. Protecting and enhancing the Blue Ribbon Network not only for its amenity and natural qualities but also for its transport and economic abilities.

Changes to the policy:

Introduce new points:

- Make London a Blue Green City, as a cross-cutting approach to sustainable water supply and drainage, flood risk management and green infrastructure.
- Prioritise investment and interventions to benefit first of all low income households, those who are at greatest socio-economic disadvantage and face health inequalities

Point A: the target to become zero carbon should be more ambitious. The plan needs a stronger focus on renewable energy and would like to see included in the policy commitment to facilitate support and promote the uptake of solar energy in new and existing buildings. Globally, solar is the fastest growing form of renewable energy and there is potential for the plan to act as a catalyst for innovation with the ultimate goal of widespread adoption of solar energy, thereby achieving or even exceeding aspirations set out in the mayor's Solar Action Plan.

Point B - the list should also address fuel poverty, since this is essential to being more resilient. Homes and other properties built to the highest standards of sustainable design have minimal fuel requirements and there may be potential for some schemes to be generators of energy, thereby benefiting occupants, the community, and the wider environment.

Point D: include public and community ownership of renewable energy

Chapter 2: Spatial Development Patterns

The London Plan is the Mayor's statutory Spatial Plan, which is mandated to integrate his various policies in a spatial perspective.

We argue that this chapter is not only the core of the statutory requirements of this London Plan, but also at the heart of the consistent failure of the London Plan to deliver. We see a continuation and indeed entrenchment and exacerbation of the main features of spatial planning in London, which have had extremely negative effects in the past, and which on the basis of our experience and evidence as communities across London will continue to produce bad outcomes as a result of this plan. How long can the current model continue destroying at random existing assets and council housing to try to maximise the finances to pay for development, while failing to deliver what Londoners need?

The Spatial Plan presented in this Chapter is fragmented and opportunistic, with multiple overlapping and contradictory spatial elements. It sets in place a framework for physical development and for funding development which is fundamentally unable to effectively deliver the policy proposals presented: extraordinarily weak delivery of housing at social rents, poor public spaces, displacement of low income Londoners, destruction of valued community infrastructure and assets. We observe that without a fundamental rethink of the spatial development model this London Plan will see no step change in the failure to deliver the houses and lifetime neighbourhoods that Londoners need; we predict this plan will make things worse for many places and people in the city.

The New London Plan has some familiar features in its approach to spatial planning: (“strategic”) **areas for regeneration** are defined as areas within the 20 per cent most deprived LSOAs in England using the Index of Multiple Deprivation – here the focus is on addressing inequality; **Opportunity Areas** are large sites expected to play a significant role in delivering London’s future housing and employment – these should “fully realise their potential” (SD1 A) – here the focus is on maximizing delivery of houses and jobs; **Town centres** feature as important new sites of planning concern, with scope for intensification and a stronger emphasis in providing new housing development (Policy SD6 to Policy SD9) – here the focus is on bringing forward new residential and leisure uses for town centres and high streets. **Central Activities Zone** continues to focus on prioritizing international retail, commercial and cultural functions, and seeks protections against office to residential conversions (Policy SD5 F; 2.5.7) - Special Policy Areas may be defined to protect specialist clusters and areas of special cultural heritage.

In addition, and not included in this chapter, is the new suggestion in Policy H1 (B2a), for “**incremental intensification**” (4.2.5) which identifies “sites with existing or planned public transport access levels (PTALs) 3-6 or which are **located within 800m of a Tube station, rail station or town centre boundary**” ... for optimizing housing delivery potential on such sites as small

housing sites, brownfield sites, strategic industrial land, surplus public sector and utility sites, low density commercial and retail uses etc. Maps 4.2 and 4.3 therefore represent another spatial pattern of development which should be considered relevant to Chapter 2 and therefore the maps and discussion of them should be located in this chapter on Spatial Development Patterns; or integrated in the discussion of spatial development patterns. This is particularly important to ensure that different elements of spatial change in the city are consistent in terms of how their differential impacts on neighbourhoods, communities, and existing uses and assets are assessed and treated in policy and delivery.

Overlapping and contradicting spatial development policies

There are, then, various overlapping spatial frameworks which are being imagined here, each with different policy goals, instruments and procedures (e.g. for preparing plans, for enabling participation). We note responses on particular policies in this Chapter but here we make some initial overall observations on the contradictions between the different goals for different spatial elements which in fact overlap and refer to the same places in the city.

Policy SD1

Opportunity Areas are more fully presented in the text of Chapter 2 of the Plan, with some detailed planning diagrams. We hope that this indicates a desire to subject these spatial elements of the plan to proper and effective evaluation. However, a summary table of the housing targets, employment targets and stage of development of the Opportunity Area would be useful for ease of reference and comparison. Unlike the current London Plan, there is no longer an Opportunity Areas annex. Consequently, there is relatively little detailed information on each area. This includes the new OAs which have appeared with no public pre-discussion and ongoing areas where plans for development have reached an impasse because of the failure of the approach being taken – for example at Old Oak, there is no plan in sight for the funding OPDC requires for the “clear strategy for how redevelopment should help to optimize economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners” (2.1.57, p. 48-9).

The 48 OAs, include 9 new ones (some of which are re-classified existing Intensification Areas). New Opportunity Areas are proposed at Clapham Junction, New Southgate, Poplar Riverside, Romford, Hayes, Sutton, Great West Corridor, Kingston, Wimbledon/ Colliers Wood/ South Wimbledon and Wood Green/ Haringey/ Heartlands. **There is no effective process for identifying and designating OAs.** New Opportunity Areas being proposed should have been consulted on at an early stage **before** their designation. As key elements of the London Plan they should be clearly identified and discussed here in some detail, with evidence justifying their designation, so they can be considered and evaluated in the examination process. New Opportunity Areas should be clearly justified against existing land uses, as should the targets for housing and employment, which are often set at

unrealistic and ambitious levels without any consultation or review, without adequate research or justification, and with long term consequences for excessive density and minimal delivery of community and social infrastructure (the ongoing concern of numerous communities across London – see the Grand Union Alliance submission to OPDC Local Plan Reg 19 consultation).

The large role of “Opportunity Areas” in the delivery of the London Plan targets, is at odds with their status as exceptions to both viability norms (their large infrastructure requirements and often very challenging sites to bring forward for development are explicitly excluded from the modelling of the London Plan Viability Study – 5.6.14) and affordable housing norms (as set out in the Mayor’s Affordable Housing and Viability SPG, 2.8.0, 2.8.4). They often lack formal plans (OAPFs are usually SPGs, few are Area Action Plans). And there has never been a systematic review of their operation and outcomes, for example, in relation to delivery of housing at social rent levels, achievement of effective public and open spaces, levels of occupancy and foreign ownership, levels of family housing delivery and no assessment of the value of existing uses in these areas.

We have strong evidence that these developments lead to displacement of existing communities and are not subject to effective requirements for participation in planning processes. These are some of the reasons why Just Space has argued that there should be a moratorium on any new OAs, and no more approvals of OAPFs, until a full public scrutiny has taken place.

We thus anticipate a robust, evidence-based interrogation of the processes and justification for existing and planned new Opportunity Areas in the current examination and review process.

Figure 2.2. The definition of OAs as “Nascent, ready to grow, underway, maturing, mature” is an opaque classification, and reflects the weak relationship between Opportunity Areas and the planning process. A clearer relationship to the planning process should be identified in Figure 2.2, and linked to a much stronger planning approach to OAs, which opens them to effective public consultation, examination and inspection. Thus, legible relevant categories could be: Proposed (by whom? Proposed designation consulted on by when?), Initial Vision (consulted on and reviewed within time frame of?); OAPF (consulted on and adopted); Incorporation in local plan (e.g. with the goal to achieve this within, say, 2 years of designation). It is hugely inappropriate that the largest quantum of development planned for the city should be effectively (un)planned through unexamined Opportunity Area Planning Frameworks.

Policy SD1 Proposed additional Policy text on planning process and participation in OAs: We suggest to combine

SD1 A 3) and SD B 10), with the addition of a stronger version of text 2.1.4, including a timetable for subjecting OAPFs to formal evaluation within the planning system. Thus...

“The Mayor will support and implement adopted planning frameworks, to ensure that at every stage of the planning process, including assessment of existing land uses prior to proposed designation of OAs, these areas of significant development quanta are subject to early and effective public and stakeholder participation*. The Mayor will work closely with relevant local boroughs to speedily incorporate these planning frameworks within local plans to bring forward effective public consultation, evaluation and examination of OA plans. Designation, targets, frameworks and plans for Opportunity Areas must be prepared in a collaborative way with local communities and stakeholders.”

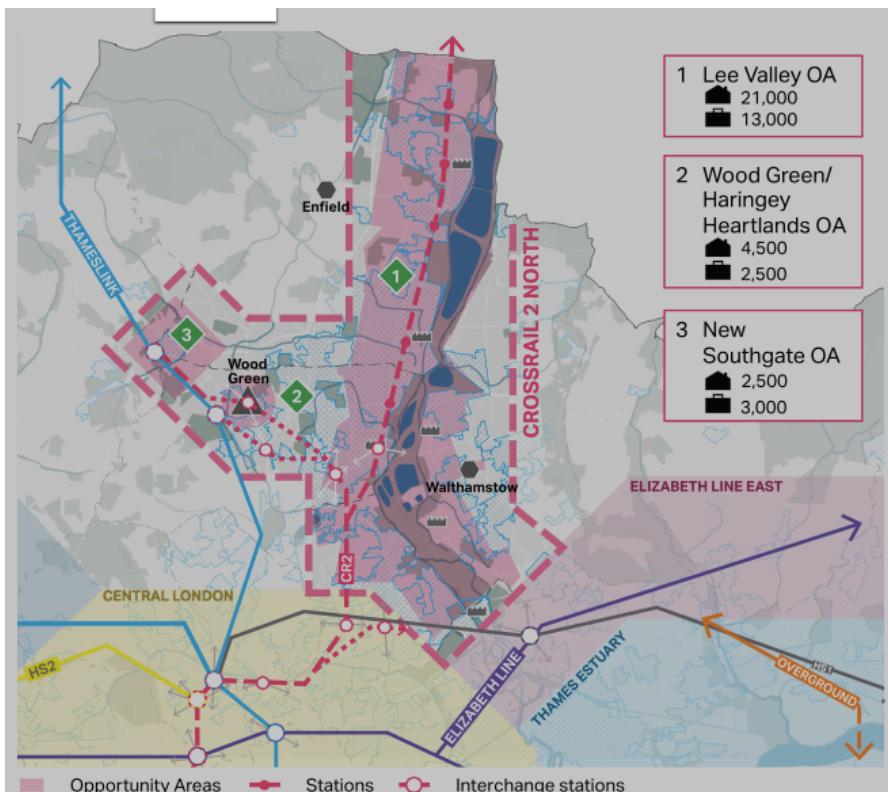
*To ensure full account is taken of small businesses, and others involved in the local economy, this should be made explicit when referring to public participation. Furthermore, A 5 should include “and vibrant and diverse local economies” and in B 5 ‘other industrial capacity’ should be defined i.e. Locally Significant Industrial Sites and non-designated industrial land.

2.1.2. Conflicting policies within Opportunity Areas

Overlap of strategic areas for regeneration with Opportunity Areas is of concern – major redevelopment of the poorest areas in the city to provide the housing and commercial developments imagined for Opportunity Areas, combined with the lack of funding, the prioritization of transport infrastructure in the application of S106 and CIL charges, and weak requirements for social housing in these areas all raise questions about how the ambitions for regeneration can be met in these areas. The Policy suggests to: “Ensure that Opportunity Areas maximize the delivery of affordable housing and create mixed and inclusive communities” (Policy SD1-A-5) or “ensure that Opportunity Areas contribute to regeneration objectives” (SD1-A-6). But this is at odds with the expectation that Opportunity Areas will maximize growth within the fragmented and limited funding regime dependent on S106 and CIL charges and difficult infrastructure challenges of these areas. This is an ineffective goal, likely to lead to removing poor communities, and little re-provision of housing at social rent levels (see below for more detail).

The IIA considered that “It was also recommended that further reference could be made as to how such infrastructure provision could benefit existing communities, as well as new developments within growth corridors and opportunity areas.” (p. 91). The GLA responded that “The GLA advised the purpose of this policy is to draw out any spatially specific considerations that apply to OAs generally and that other policies in the rest of the Plan would also apply; therefore, policies such as public realm, inclusive design, social infrastructure, air quality, green and open space, Healthy Streets and other transport policies addressed issues such as active travel, inclusive design, air quality, provision of open space in more detail. In addition, other GLA strategies provide further details on some of these issues.”. We note that this list of appropriate planning policies are what are de-prioritised in Policy DF1 D.

The likely equality outcomes in planning terms for Opportunity Areas are marked as unknown in the IIA, against Objective 7: “To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense of place and distinctiveness reducing the need to travel by motorised transport”. We argue on the basis of evidence from many Opportunity Areas that the outcome is known, and that these areas are not producing outcomes which meet that objective.



Opportunity areas and viability

Furthermore, another issue in relation to the overlap amongst these different spatial development categories, all designated for substantial development, is their different treatment in the Plan. It notes, **Figure A1.5** shows overlap between town centres and strategic areas of regeneration, for example, but much stronger statements on participation in regeneration areas are made in the Mayor's Best Practice Guide for Estate Regeneration, and in some text: “In order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in collaboration with local communities, involving a broad spectrum of groups and individuals, to develop a shared vision for the area. Successful regeneration requires all stakeholders to operate in a collaborative way, pooling resources and creating partnerships” (2.10.3). This text should be in the Policy boxes of SD1, SD8 and SD10, as well as in GG1 to guide implementation of the London Plan by all relevant actors including private developers. At the moment, for example, no such systematic approach to participation has been identified for Opportunity Areas.

We propose a systematic statement on early and effective participation in all spatial planning processes outlined in Chapter 2, and to be integrated with the planning processes in Chapter 4 Housing. We have attached to this submission an evidence base document, [Stronger community participation in regeneration: a paper to inform discussions with the GLA.](#)

Policy SD2 Collaboration in the Wider South East (WSE);

Policy SD3 Growth Areas in the WSE and beyond

There are issues about which we are concerned here:

- (1) London is not just part of the WSE, but should have appropriate relationships with the rest of the UK (see Towards a Community-Led Plan for London).
- (2) Local and regional economic geographies, travel to work patterns and costs, as well as wider sustainability would be substantially challenged if the WSE accepts jobs and industrial space, to release space for homes in Greater London (i.e. land swaps and sector swaps).

SD2 E

The approach taken here potentially feeds an imagination in which London considers it can meet housing demand at the expense of other land uses, within its bounds. **The loss of activities and functions intrinsic to London's economy is a grave threat to the long term sustainability of the city through increased travel distances through separation of uses.** SD2 E proposals on the 'export of industrial land' ("substitution of business and industrial capacity where mutual benefits can be achieved") should therefore be firmly resisted. We propose that this be deleted.

SD4 Central activities Zone (CAZ)

This promotes the continued growth of the Central Activities Zone and protection of its agglomeration functions and is mainly 'business as usual'. However, we note the provision for "Special Policy Areas" Policy SD4 G (2.4.13) and the specification in text that "They should only be defined in the above exceptional circumstances", although SD4 G suggests that "more local Special Policy Areas should be supported and promoted". This needs clarification. We propose that further use of the SPAs could be made in the context of pressures for development in relation to locally significant residential, cultural and heritage assets in the CAZ. The wording of local Social Policy Areas should be applied to Policy SD4K, and such areas should be clearly exempt from Policy SD4 L.

The categorization of specialist creative clusters as special policy areas (2.4.13) serves as a useful precedent/ principle for clusters of ethnic and migrant traders at Latin Elephant and Seven Sisters, for example. Indeed such protective approach to marginalized, grass roots or ethnic community clusters should be embedded into OA and regeneration policies and practices. We propose that this policy be made more widely applicable, for example to town centres and high streets, outside the CAZ. We specifically

recommend this for inclusion in Policy SD7 and Policy SD10 where valued clusters of community uses and assets might otherwise be threatened in town centres and areas of regeneration.

In certain OAs within CAZ, residential is more to the fore, as in Vauxhall Nine Elms Battersea, Elephant & Castle. The protection and enhancement of residential enclaves and development is deserving of strengthening as at 2.4.17 & 2.4.18. We vehemently oppose the extension of CAZ functions at the expense of existing residential neighbourhoods, especially where this entails valuable social housing being lost, as in Elephant and Castle. The proper opportunity costs of losing existing housing provision in well-located and central parts of the city need to be assessed.

SD5 Offices, other Strategic Functions and Residential Development in the CAZ

We note Policy SD5A, prioritizing strategic functions of the CAZ over residential development; as well as 2.5.5 giving equal weight to office and residential developments in Vauxhall Nine Elms Battersea and Elephant and Castle. We note with concern the relation of these to Policy SD4 L requiring a different configuration of social infrastructure in the CAZ. We note the lower CIL and S106 yield from office development. We raise concerns about the implications of this for ensuring that existing communities in these areas benefit from the development, that they are spatially integrated, and that new residents are fully supported through appropriate social infrastructure. We can bring forward extensive evidence to show this is not being delivered in key opportunity areas in the CAZ.

We suggest an addition to Policy SD5A:

Developments in the CAZ should seek to benefit existing residential communities and where new residential developments are brought forward they should be fully provided for in terms of social infrastructure and the wider planning obligations outlined in this London Plan.

SD6 Town Centres

SD7 Town Centre Network

SD8 Town centres: development principles and Development Plan Documents

SD9 Town Centres: Local Partnerships and Implementation

In the current economic climate, high streets are facing threats. Retail habits are changing but other factors also present challenges too. However, 47% of businesses outside Central London are on a high street and 1.45 million employees work on or within 200 metres of a high street, and this number is growing. **Nearly 70 per cent of London's high streets** don't fall within a town centre boundary. This means that the majority of high streets have no

formal policy designation and **are potentially vulnerable to the pressure to deliver housing through redevelopment**⁶.

This needs to recognise the shrinking capacity of work space in town centres and high streets (beyond the retail frontage). The purpose of the policy should be to **protect and sustain capacity** – similar to the industrial land policies. Boroughs should ensure that they include all uses (beyond what is prescribed in NPPF). ‘Surplus’ work space should not be automatically released for residential development – it is the low cost capacity that allows for growth, adaptation, innovation. Where high streets are sections of continuous A-road or centripetal arterials, the A-road continuum should be recognised as a key setting for highly varied commerce. The arterial spaces allow local businesses to identify with more than one primary shopping frontage and to move premises to lower-cost positions along the same arterial. The variation in the cost of premises along arterial routes is an extraordinary strength in the traditional urban system.

The main evidence document, the **2017 Town Centre Health Check Analysis** report is based on very high level statistics and projections. It is based on particular assumptions (e.g. a few high level centres will prosper, most small centres will not), which don’t reflect a sound and fine grained understanding of what happens on the ground, in terms of the dynamics of local businesses and organisations, how people live, shop, access education, health, other social infrastructure etc. Research from Suzanne Hall on super diverse high streets for example shows that Rye Lane in Peckham has more retail outlets, jobs and is more profitable than Westfield Stratford⁷. This also brings in strong evidence of the benefits of subdivision of units for a range of very diverse activities. Laura Vaughan’s research on Adaptable Suburbs points out the essential role of small centres and high streets in Outer London in providing sustainable growth.⁸

Another concern is that home-based work is not considered in either of the Town Centre, or Housing or Design policies. Research from Frances Hollis shows that 25% of the UK workforce is engaged in home based work at least one day a week. ‘The development of workhomes designed to accommodate the dual functions of dwelling and workplace has the potential to bring substantial social and economic benefit to home-based workers, to employers and to society at large.’⁹

⁶ **High Streets for All**, 2017, GLA, https://www.london.gov.uk/sites/default/files/high_streets_for_all_report_web_final.pdf

⁷ <https://www.architectsjournal.co.uk/news/tread-softly-for-you-tread-on-my-dreams/8687894.article>

⁸ <https://justspacelondon.files.wordpress.com/2014/04/falp-laura-vaughan-submission.pdf> and http://www.sstc.ucl.ac.uk/sstc_index.html

⁹ <http://www.theworkhome.com/knowledge-transfer-fellowship/>

Town Centres are the main focus for local identity and key to building sustainable, healthy, walkable communities (the Healthy Streets Approach) and providing for 'growth and diversification for prosperity'. We note that: Borough Plans are to identify town centres suitable for higher density housing; low density buildings should be redeveloped (see **SD8**); each Borough is to have a Town Centre Strategy produced in partnership in a way representative of the local community (**SD9**). We also note **Figure A1.5** which depicts the overlap between town centres and regeneration areas (the 20% most deprived parts of London) and **Figure A1.3** and Annex 1 which depicts Town Centre Residential Growth Potential.

The provision of local growth and access to a wide variety of services, goods, and employment opportunities by sustainable modes of transport may be welcomed. But this growth should be carefully examined to reveal the significant quanta of development, particularly new homes, that this intensification is expected to contribute. **The consequences for town centre characters and functions are likely to be very challenging.** Within **SD 6**, sub clauses **A2** (intensification and renewal) and **A4** (sense of place and identity) are to a large degree not reconcilable.

We note that these issues have been raised in the IIA. In relation to Policy SD8, the London Plan IIA requests that "Details on the provision of green space, cultural participation to support vibrant town centres, and affordability should be considered." The GLA response stated these are "addressed more specifically elsewhere in the Plan." In relation to SD9 the IIA requests that "It was recommended that further information be provided on how Town Centre Strategies could support and develop cultural infrastructure, and appropriate access to such opportunities. It was also recommended that further detail be provided in relation to housing development, for example the policy could make reference to affordable, adaptable and accessible provision." The GLA felt that no changes needed to be made, and that "The GLA advised that further information is provided in other policies within the Plan which address cultural uses and housing". Nonetheless, of great concern is that the appraisal notes an "unknown" impact for both these policies in the Equalities Impact Assessment, against the key objective 13, "To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position."

We feel it is unsound that there are concerns raised by the IIA about the safeguarding of key social and community infrastructure in town centres, that no provision is made in relation to this in the relevant policies, and that the impacts of this policy on the foundations of vital and lifetime neighbourhoods in London, especially for poorer communities, are declared to be unknown. It is our view these highly valued and socially important functions of town centres and high streets will be seriously affected by this policy as low value

uses are displaced for high value uses, economic and cultural activities for unaffordable housing.

Generally, the spatial expression that is 'High Streets For All' has been ignored, as in **SD8B**; indeed, save for one diagram on the classification of town centres (**Figure 2.18**), the whole issue of local parades/centres has not been recognized. See Professor Suzi Hall's work revealing that 'High Streets' are more important than Town Centres for services, employment, vitality and vibrancy.

Proposed Changes to policies

SD8 Town centres: development principles and Development Plan Documents (changes noted in red ink)

Policy SD8 – proposed additions

- A. Development Plans and development proposals should take a town centres first approach by:
 1. adopting a sequential approach to accommodating town centre uses including **industrial**, retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites **on the edges of centres** that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport
 2. firmly resisting **large scale** out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office **and industrial** locations in outer London (see Policy E1 Offices) **and exceptions for town centre at edges of centres where town centre boundaries could be extended**
 3. providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan
 4. realising the full potential of existing out of centre retail and leisure parks to deliver housing **and economic** intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location having regard to parts A(1), (2) and (3) above **but an increase in industrial floorspace is acceptable.**
- B. In Development Plans, boroughs should:

1. define the detailed boundary of town centres in policy maps including the overall extent of all non-residential uses in the extent of the town centre and adjacent areas, including all high streets, industrial areas, primary shopping areas, primary and secondary frontages and night time economy. Some town centres may be fragmented (e.g. where pockets of secondary frontage or non-residential uses inside blocks are separate from the main town centre boundary). Areas containing only housing should not be included in town centre boundaries.
- Champion high streets as social, civic and cultural infrastructure. High streets are convenient locations for traditional social infrastructures but are also perceived as social infrastructure in their own right. It is essential to understand the spectrum of social functions better so that growth on high streets does not undermine, but rather maximises this
- Champion high streets as public spaces. Development on high streets should recognise the role of high streets as public spaces for congregation and cultural exchange, as accessible and connected places, and as locations for night-time activity.¹⁰
3. develop policies for the edge and fringes of town centres, ~~revising the extent of shopping frontages where surplus to forecast demand and~~ introducing greater flexibility ~~between non-residential uses~~, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances ~~but firmly resisting residential use at ground floor~~
4. identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1 comment on this: without accurate data on what is there in town centres, the Annex 1 indicators are insufficient, so additional criteria added below that town centres must be properly audited.

Criteria to consider in assessing the potential for intensification in town centres include:

- i. an audit and assessment, with public consultation, of the contribution of existing retail, office, commercial, industrial and cultural activities to the local community and wider London communities to provide a baseline to prevent displacement of existing valued uses
- ii. assessments of demand for retail, office and other commercial uses

¹⁰ **High Streets for All** recommendations, 2017, GLA,
https://www.london.gov.uk/sites/default/files/high_streets_for_all_report_web_final.pdf

- iii. assessments of capacity for additional housing **on higher floors of buildings above non-residential intensification**
- iv. public transport accessibility and capacity
- v. planned or potential transport improvements – to indicate future capacity for intensification
- vi. existing and potential level of density of development and activity
- vii. relationship with wider regeneration initiatives
- viii. vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre **although in central London Boroughs this is likely to be negligible**
- ix. potential to **protect, enhance and complement local character, including social and economic character, existing heritage assets, existing ethnic and socially specific assets, and improve the quality of the town centre environment.**
- x. viability of development.
- xi. **Potential for strengthening existing local civic and economic activities**

5. identify sites suitable for higher density mixed-use residential intensification **with non-residential uses at ground level** capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example:

- a. comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks **to include intensification of economic and civic uses as well as provision of housing**
- b. redevelopment of town centre shopping frontages that are surplus to demand **into adaptable types to accommodate different non-residential uses**
- c. redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing **and increasing by 50% non-residential uses and floorspace** This seems too simplistic, and needs unpacking. The first step should be to assess why upper floors are not being properly used and see if steps can be taken to get them well-used.
- d. delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses **at ground floor** as part of a mixed-use development.
- e. support flexibility for temporary or ‘meanwhile’ uses of vacant properties **which exclude temporary use as residential.**

6. **conduct a complete audit of all non-residential accommodation; internal and external floorspace; and jobs in the borough prior to preparation of local plans, and prior to defining town centre boundaries**

C. Development proposals should:

0. ensure that commercial, **industrial and office** floorspace relates to the size and the role and function of a town centre and its catchment **and ensure accommodation and local policy are sufficiently adaptable to absorb a range of non-residential uses**
1. ensure that commercial, **industrial, office and all non-residential** space is appropriately located having regard to Part A above, fit for purpose, **with at least basic** fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing, and marketed at rental levels that are related to demand in the area or similar to surrounding existing properties. **If non-residential properties lie vacant fit out should be improved and rent reduced**
2. ~~support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents~~
3. support the **social, civic and economic** diversity of town centres by providing a range of **commercial** unit sizes, **located appropriately within the block at ground floor level**, particularly on larger-scale developments **and on developments on arterial roads which have potential as high streets.**

Policy SD9

Policy SD9 A which calls for each town centre to have a Strategy produced in partnership, inclusive and representative, at the local level is supported, but to reflect its potential, this should be in the over-arching/ framing Town Policy SD6 and this approach should be embedded in all spatial policies for plan-making, including in SD1 for Opportunity Areas, and H2 Small Sites for incremental intensification. We recommend inclusion of a strong overall statement in GG1 and a commitment to develop a Mayoral SCI establishing both the Mayor's own practice and giving guidelines for good practice across all actors.

Policy SD 9 C 1) Article 4 Directions to protect the economic and social activities of town centres from permitted development rights for housing redevelopment are welcomed.

However, this protection is not supported by Policy SD8 B 4 and Annex 1, as well as H2 Small Sites, which advocates incremental intensification up to 800m from Town Centres. We have grave concerns about the implications of the wider Town Centres policy for the potential loss of community venues, affordable and free access to communal, sport and heritage-related activities, and other valued assets such as locally based or ethnically valued businesses and employment. This is especially important in view of the overlap between regeneration areas and town centres, as shown in Figure A 1.5 where the loss

of social infrastructure and community assets in the context of London's poorest communities would have a devastating effect.

Please note our recommendations for effective participation in planning in these areas in relation to text 2.1.2 in relation to overlap and conflicts between different spatial elements of this Plan.

Additional Policy element in SD9

We suggest inserting here an additional text on designation of local Social Policy Areas, from SD 4G and text 2.4.13 to provide an opportunity for local communities and boroughs to afford protection to valued community activities, facilities and cultural and heritage assets.

Annex 1: There is a detailed listing of Town Centres in Annex 1, with maps, indicating their classification, levels of commercial, residential and office development potential. The table also lists if the town centre is part of or includes a strategic area for regeneration. The basis for declaring town centres available for incremental, medium or high residential and commercial growth potential is not evident. Does this designation conform with the expectations of Policy SD9 A? Has the planning for intensification of town centre uses and the identification of potential been undertaken in partnership with existing communities and businesses? Has there been an effective consultation process on the future development of these town centres? Have existing employment and other uses of the sites envisaged for development been assessed? How will existing valued community and heritage assets and uses be protected?

We propose inserting clarification on this in Annex 1:

Additional Note to Title, Town Centre Network: The designations of potential for development in this table are provisional, subject to consultation and assessment in each town centre.

SD10 Strategic and Local Regeneration

We object that the collaboration with communities is in text only (2.10.3) and not explicit in policy. Additional text points (2.10.6) could be usefully incorporated into policy together with new points that demolition is not implicit in regeneration and that social infrastructure, local employment and affordable premises including industrial units are also key to successful regeneration. In further analysis of this policy, It is important to cross-relate with the Good Practice document on Estate Regeneration and Housing Policy H10 as regeneration areas are likely to include council estates.

Thus in the discussion of Policy SD10 (p. 92-3), it is suggested (2.10.3) that "In order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in **collaboration with local communities**, involving a broad spectrum of groups and individuals, to develop a shared vision for the area.... There should be a shared

understanding of how the regeneration area needs to change, and how that change will be secured, managed and embedded within and supported by the community. (p. 93-4)”.

TEXT CHANGE PROPOSAL: The entire text of 2.10.3 needs to be placed within the policy box of SD10, to ensure this is able to be secured at implementation. The policy currently sees no role for communities in bringing forward major changes to their homes and neighbourhoods through neighbourhood plans or community plans. Commitments to public participation in planning, notably in regeneration and large scale developments, need to be considerably strengthened.

Chapter 3: Design

This chapter of the Plan collects together various policies on design of big schemes, other new developments, density, individual buildings including housing space and performance standards, safety issues and circular economy principles in design.

D1 London's form and characteristics

This set of policies comprises general advice on what places should be like. It fails to deal with participation in design processes and omits references to London's overall structure or the move towards more local self-sufficiency. The importance of sunlight in public spaces, schools, homes etc is mentioned only in supporting text.

Just Space response:

D1 A 7 “provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity”

Add: in such a way that each enjoys sunlight throughout the year, at least in places.

D1 A 8 “encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area.

Just Space addition: **Foster the availability of commercial and public services within convenient distances from homes and jobs in line with policy SD7F and to reduce the need to travel.**

D1 B Just Space addition: (7) demonstrate the community engagement process undertaken and how it has influenced the design.

§3.1.11 and 12 Text emphasising London's Circular Economy Route Map is very welcome. It should be strongly reflected in policy, however, by strengthening...

D1 B 3: “aim for high sustainability standards

Just Space addition: **and follow the guidance in London's Circular Economy Route Map. A priority should be on the retention and upgrading of existing building stocks unless there is strong evidence to support demolition / replacement.**

And in text the Mayor should commit himself to lobbying government for harmonisation of VAT rates between new building and refurbishment as

recommended by the 1999 (Rogers) Urban Task Force and many other experts and environmentalists. The current disparity is the enemy of sustainability.

Finally there needs to be mention in D1 of the need for high standards of access design for all disability groups – on the lines of our proposal in D3 below.

D2 Delivering good design

This policy should be strengthened to enforce the requirement for social impact analysis (SIA) to be undertaken and published before major developments are designated or designed. Further elaboration of this proposal are in the Just Space Community-led Plan for London additional chapter on the subject.¹¹

D2 A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area- based strategies, which covers the following elements:

- . 1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)*

Just Space substitute for 1): Social Impact Analysis, prepared with local communities and stakeholders, following guidance to be produced by the Mayor.

G The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:

- 1) design reviews are carried out transparently by independent experts in relevant disciplines*

Just Space proposed addition at the end of 1): **and always with a number of local community representatives.**

This would be an extension of the valuable pioneering practices being followed by the Mayor in his OPDC.

¹¹ Social Impact Analysis: additional chapter for Community-led Plan for London justspace.org.uk/history

D3 Inclusive design

This requirement is explicitly treated as only applying to project/building design. It should be moved or repeated in D1 which has a wider scope, covering public areas, district design, master planning.

§3.3.8 In playing the role described here the Mayor must undertake to maintain consultations with a wide range of disability representative organisations. He should also build upon the GLA's own *Quieter Homes for London* standards of about 2005

The text of this section relies on BS8300. This reference should be qualified because that standard is acknowledged by the BSI as not being sufficient to meet the needs of people on the autism spectrum. Furthermore the Mayor, if he is to rely on this document, should ensure that copies are available free of charge which is not the case at present.

Buried in a sub-section of text §3.3.1 is “...show that the potential impacts of the proposal on people and communities who share a protected characteristic have been identified and assessed...

Just Space proposal: reflect in policy the requirement that (in effect) EquiA is needed. Equalities considerations should be a core element in all design work.

D4 Housing quality and standards & Table 3.1 Space Standards

Just Space welcomes the requirement that the same space standards are applied to all tenures.

Just Space groups are alarmed at what seems to be a relaxation of enforcement of space standards, **seeks a reversal to strengthen standards and proposes that there should be a new Key Performance Indicator (KPI) on compliance with internal space standards AND external playspace/ open space standards.** This would mean that compliance was monitored and reported in the Annual Monitoring Report.

D4E “Residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 London’s form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.”

Supporting text §3.4.4 & 5 elaborates, suggesting that single aspect is acceptable for flats up to 2 bedrooms. **Suggest modify text to add at least 2-bedroom flats to the ban on single-aspect.**

D5 Accessible housing

The only change from the 2016 Plan in the policy box is that 10% has become **at least 10%** which we support.

All new housing should be built to be accessible and able to meet changing needs over a lifetime, and therefore the Lifetime Homes standard or an equivalent should be the default standard for all new housing. Under the London Plan, 87% of new homes were built to Lifetime Homes standard in 2012, but the weakening of this strategic direction will undermine the provision of disabled friendly housing in London.

To realise the goal of meeting housing need it is essential to have accessibility at the centre of housing and planning strategies. Without radically improving access and design standards we will continue to produce too much housing where people can't get to or through the front door, where they can't access all the rooms in the house, where they can't use the bathroom, where they have to stay in hospital for much longer because their home is inaccessible, or where they can't live independently or safely or visit their friends at their homes. All for want of designing housing to access standards that are available, tried and tested and extremely cost-effective.

The text section on exceptions to step-free access is too widely drawn.

§ 3.5.6 In exceptional circumstances, the provision of a lift to dwelling entrances may not be achievable. In the following circumstances and in blocks of four storeys or less, it may be necessary to apply some flexibility in the application of this policy:

- *Specific small-scale infill developments (see Policy H2 Small sites)*
- *Flats above existing shops or garages, and stacked maisonettes where the potential for decked access to lifts is restricted*
- *Blocks where the implications of ongoing maintenance costs on the affordability of service charges for residents will be prohibitive.*

Just Space proposal: **delete last bullet point**. The first two exceptions are reasonable in these defined physical circumstances but the last could be exploited to remove lifts from blocks lacking these defined features. In addition 'only' should be inserted in the main paragraph after 'and' to remove any ambiguity.

D6 Optimising housing density

This is the place where the density matrix is replaced by the "design-led approach" which lists most of the right factors which should influence maximum density, including social infrastructure. But there is no quantification: the list of factors is just going into the black box of "design".

Just Space response:

We welcome the inclusion of infrastructure capacity in D6A and the specific inclusion of social infrastructure in the elaboration at D6B.

However we consider it a grave mistake that these factors are not being quantified in firm criteria. **Daylight, sunlight, children's play space etc should all be subject to quantification** – either alongside a revised density matrix or otherwise.

We are also concerned that the needs of some equalities groups – notably Gypsies and Travellers and houseboat dwellers – are incompatible with dense development and this needs explicit recognition in the Plan.

We are profoundly concerned by the proposal in the draft Plan to discontinue upper density limits set in some sort of table or matrix. Clear upper density limits are essential to discourage speculative over-bidding for sites. Our strong recommendation is **that the upper limits of the density matrix should be strictly applied, at least until a borough has developed the Design Code (policy H2B(2)), which should in turn contain transparent and firm upper limits, not only for small sites.**

GLA officers say in meetings that increased density is always welcome and this attitude seems to pervade the Plan. Just Space groups are deeply concerned that higher density not only means jeopardising standards, but will tend to reduce numbers of family sized units - and will probably reduce social rent/ low cost rent proportions as well - not just because of land price inflation but also because of built form of high density schemes: high building and management costs & thus high service charges.

We note that, elsewhere, the draft Plan accepts the importance of discouraging developers from over-bidding and creating land price rises "based on hope value" (§ 4.6.13). However this logic is applied only to affordable housing percentages and only in Opportunity Areas. The same logic ought to apply to upper density limits and throughout London to minimise speculative land price escalation.

A revised version of the 2016 density matrix has been proposed by the Highbury Group in its submission and valuable work was done by GLA and TFL last year to refine the accessibility measures and take account of bus and train service capacity. The Just Space Community-led Plan proposes that density controls take account of social infrastructure capacity. If a more sophisticated version of the matrix cannot be brought forward in time for the EiP we would support retention of the 2016 matrix for use in boroughs which have not yet completed acceptable Design Codes which include transparent density limits.

It is important to stress that nothing in the density matrix prevents good design and we strongly support the improvement of design. It just requires an upper envelope of density to reduce market uncertainty and speculation.

D6 B (3) is admirable in insisting that infrastructure needs to be in place in time for new development and that development may need to be phased accordingly. **However it says “...in exceptional circumstances...” which we consider should be deleted.**

D7 Public realm

This policy depends upon a document which is not yet published, even in draft, and is accordingly hard to comment upon. It has our provisional support.

“D7 G Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter.”

D 7 I “Ensure that shade and shelter are provided ...”

Just Space suggest inserting **...and sunlight throughout the year in parts of the space**

D8 tall buildings

Declares “tall” to be a relative concept. Boroughs should define it for their areas. They should make maps showing where tall buildings are and are not appropriate.

The draft London Plan is more encouraging of tall buildings than the current 2016 Plan, which required

- identification of inappropriate locations,
- tall buildings are limited to major regeneration areas etc
- Mayor to work with Boroughs to identify sites
- Mayor's Characterisation SPG an important guide

And we are alarmed about this greater permissiveness, both for the direct effects and as yet another way in which loose, flexible, policy would foster speculative land price escalation.

Most of the policies on tall buildings here are intended to cover residential and non-residential buildings. Many Just Space groups have serious concerns about the sort of tall residential buildings that are being built now. There are concerns about social isolation, distance from open space, safety, service charge costs, whether social amenity and infrastructure are provided and other factors. Equally there are other groups in Just Space whose members live in tower blocks and value this form of social housing provision. We wish to see the Mayor doing research and consultation on the range of experiences and preferences of households of various ages, sizes and compositions.

Rules governing high residential buildings might better be in the housing chapter but cross-referenced here to focus the attention of designers.

D8 C3 excellent on impact. Just Space suggests adding new

d) The energy costs of higher buildings associated with more lift use, heating, cooling and wind chill should be taken fully into account.

Add a new sub-section **D8 C 3 h) Since standards for the structural fire-resistance, cladding, means of escape and other safety features of tall residential buildings are currently under review by various authorities, extreme caution in the design of such buildings must be the rule pending new regulations and standards.**

and D8 C 3 i) **The Mayor stresses that existing buildings should not be assumed to be unsafe simply by virtue of their height. Well designed tall buildings can be as safe as low ones and expert scrutiny is required to assess whether original design or construction or failings of subsequent management, maintenance or modification have created hazards.**

D9 Basement development

Boroughs should develop policies...

No comment

D10 Safety, security and resilience to emergency, and D11 Fire safety

No comment

D12 Agent of change and D13 Noise

We welcome the protection of important parts of the economy, industries important for the jobs and services they provide.

Construction noise can be quite problematical and the intensification of airports (without expansion) and the tube and rail networks can generate noise nuisance for many Londoners.

With the pressure on local Environmental Health Departments due to reduced staffing and resourcing, the Mayor should ensure that all of his responsibilities and activities assist in preventing the emergence of noise nuisances and their suppression. For example, London wide 'noise' guidelines can be formulated to which 'considerate contractors' and transport operators can sign up. The Mayor has power and opportunities through the planning system to regulate development. Citizen Science can be actively supported to provide the evidence that local communities need to effectively challenge noise nuisances.

Chapter 4 Housing

It is a widely held view among Just Space groups that London is being rapidly transformed to meet the needs of elites in the ‘global city’ framework and doing so at the expense of the diversity and community which we — and seemingly the Mayor in his “Good Growth” approach in Chapter 1 of the draft Plan— value so much and at the expense of low- and moderate-income Londoners and with costs to the real economy. Comments on the housing policies in the draft new London Plan are made in the spirit of wanting to re-balance these power relationships in pursuit of Good Growth.

The GLA’s analysis of what is wrong is a mistaken interpretation of the evidence. It is not an acceptable analysis and that is why so many of the proposals are inadequate or dangerous. The essence of the GLA position is that “The origins of London’s housing shortage can be traced to a failure over decades to provide the homes that people working in London’s growing economy require” (draft Housing Strategy §2.2) and this way of seeing the crisis leads to the Mayor’s obsession with getting as much housing built as possible, raising densities and prioritising this as being much more important than what kind of housing is built, at what prices and for whom.

This interpretation down-plays the shrinkage of the social housing stock and the massive expansion of credit to drive up prices, the dramatic growth of income and wealth inequality, the surges of local and global speculative investment and falling real wages for much of the population. All these things have contributed to the London housing crisis and the impoverishment of so many Londoners. Policies to eliminate or manage these forces are essential because more and more of us are exposed to the market to determine what housing we can get (if any) and we confront it on increasingly unequal terms. Solving the problem through building more would take many many decades to bring market rents and especially prices down (even if developers continued to build homes while prices fell, which is hard to believe), and so much of what gets built is snapped up by the wealthy so the benefits for low- and middle-income Londoners are minimal **or adverse**.

Just Space and member groups [have commented](#) on this broad range of issues in responses to the Mayor’s draft Housing Strategy of 2017. Our response to the housing **policies** of the draft new London Plan are limited to those aspects of the problem which can be influenced by land use and related policies, though text references to some non-planning actions are relevant too

Policy H1 Increasing housing supply and its associated text is a clear statement of the GLA mis-interpretation of the evidence. Its emphasis is entirely on maximising total supply of dwellings. Left until later are questions of stemming losses of the dwindling stocks of social-rented and lower rent homes, of the affordability of what gets built and how the needs of London’s diverse communities will be met are left until later or omitted, as also is the

treatment of London's severe backlog of unmet need for social and low-rent homes.

We support the view of the Highbury expert group on Housing Delivery in [its response](#):

"We consider that the Strategic Housing Market Assessment [SHMA] has underestimated the annual housing requirement for the 10-year period – the estimate of 66,000 homes a year. This is mainly because the assumption of the timescale to meet the social housing backlog has been amended from the 10 year assumption in the 2008 Plan (and the 20-year assumption in the 2015 Plan) to an assumption that the backlog will only be met over 25 years. As the backlog is primarily in relation to the unmet need for low cost rented homes, this new methodology also depresses the proportion of the 10-year requirement which is for low cost rented housing."

And

"...that the estimate derived from the Strategic Land Availability Assessment (SHLAA) that London has a capacity for 65,000 new homes a year for the 10-year plan period is based on assumptions for increased development densities which are higher than those consistent with pre-existing plan policy on sustainable residential quality and will not provide for the range of building types and bedroom size mixes needed to meet the housing requirements assessed in the SHMA. Our primary concern is that development at the assumed densities will not provide sufficient family size homes."

We are also profoundly alarmed by three other features of the SHLAA:

- (i) that it presupposes a great deal (the exact amount is unstated) of "estate regeneration", a process which the [London Assembly has shown](#) to have **reduced** the stock of social housing over the last decade. While we welcome the Mayor's recent commitment in response to consultations that ballots will be required before certain schemes involving demolition can proceed, we are very doubtful whether much net gain of socially-useful (good) growth in supply can be counted upon in this timescale.
- (ii) The proposals for housing densification on non-designated industrial land, high streets and town centres will cause severe losses of jobs and services in localities across London. Our representations on this issue are at Policy E1-E4 below
- (iii) There is a heavy reliance on small sites. This has much to commend it but would tend to produce only or mainly dwellings for the open market and thus not help meet the backlog of need nor the top priority current needs. Only if the London Plan were to impose a strict requirement for social housing contributions from small-site schemes would this source of supply be a valid contribution to good growth.

In one sense London's failure to meet its entire needs within its boundary does not matter. The Mayor needs to pretend that this is possible to satisfy the requirements of the NPPF. But London's housing pressures have been spilling out to regions near and far for decades and will undoubtedly continue to do so, further propelled by Crossrail 1 and (if it is built) Crossrail 2.

But it does matter for two reasons: (i) the cost and environmental impact of all that extra travel is **bad growth** by any standard, and borne by people in all income groups, and (ii) the massive pressure exerted by the targets are a grave threat to good growth in London in the ways outlined above.

Finally we should add that there must be doubts about the demographic assumptions. In particular projected growth is almost the same as net international in-migration which must be in doubt in the light of brexit. The other demographic problem is that the projection of household size (which yields the dwelling requirement) presumes that average household size will revert to its steady decline. We submit that continuing affordability problems and static or falling real incomes for much of the population makes this unlikely. Much lower growth assumptions for population and household numbers should have been explored and should now be explored before the Plan is approved.

Accordingly much of this Policy is misguided. It flies in the face of the evidence and is thus unsound. It should be recast to encourage boroughs to explore local and sub-regional needs in consultation with their diverse communities, and to secure target levels of social and low-rent homes including an appropriate range of sizes and adopt policies which help to dampen speculative pressure on land prices. See our comments on density (Policy D6) and Affordability (H5-7). We shall be glad to propose detailed changes.

The Mayor should certainly be leading London in calling for a great expansion of publicly-funded housing supply including greater funding for community-led schemes. The timescale of the Plan spans a number of national governments and should, so far as the law permits, indicate the longer-term possibilities for which the Mayor should be getting prepared.

We welcome the proposal to develop housing above single-storey retail parks and above car parks.

Policy H1 (B 2a) the new suggestion in, for “**incremental intensification**” (4.2.5) which identifies “sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary”... for optimizing housing delivery potential on such sites as small housing sites, brownfield sites, strategic industrial land, surplus public sector and utility sites, low density commercial and retail uses etc. Maps 4.2 and 4.3 represent a spatial pattern of development which should be considered as part of Chapter 2 and therefore the maps and

discussion of them should be there, or referred to there.

PROPOSAL: MAP 4.3 (and 4.2 showing PTAL levels) should be presented and discussed in Chapter 2

H2 Small sites

Boroughs are encouraged to support development on small sites, with presumption in favour of the development, and are given a target for small sites averaging about one third of their overall housing target.

So this is a significant change, and yet the small sites will only deliver market housing; affordable housing “should only be required through off-site contributions” (H2 H) and boroughs “should be capable of securing cash in lieu” (4.2.12). They could contribute social rented housing elsewhere, but this is much harder to monitor and will inevitably be low in number.

A further concern is the existing use of this land, and the amount of green and social infrastructure that risks being lost.

More attractive is small sites’ capacity for community led housing, including self build, housing co-ops, co-housing and community land trusts. To realise this potential, the policy for small sites must include specific initiatives such as maintaining a register of available land (a register that is fully accessible to community builders, neighbourhood forums and other community interests) and access to cheap loans. Targets should be set for community led housing.

Policy H2 D 2) proposes a presumption in favour of incremental developments – conversions, extensions, redevelopment, infill – and **Policy H2 E** requires any planning and design considerations to be outweighed by “the benefits of additional housing provision” and the requirement to prove “an unacceptable level of harm”, which is an onerous as well as variable and subjective assessment. These safeguards to neighbouring developments from the negative effects of intensification are only notional; the provisions in the Policy to protect impact on neighbouring properties are vague and unlikely to carry much weight in a planning determination. The list of safeguards in Policy H2E is incomplete compared to text 4.2.5-9, and these should be directly referred to in the Policy.

Whereas concerns and safeguards regarding negative impacts of regeneration (of estates) and potential loss of affordable housing are guarded against in the Better Homes for Londoners SPG and implied in SD10 through §2.10.3, the impact of this proposed major intensification of uses across much of London is not referred to and has not been evaluated at all.

Equalities considerations are not present in any discussion of this policy. The IIA notes that it is unknown whether this policy H2 might have negative effects on objectives 1 “To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing

the diverse needs to the population”, and 2 “To ensure London has socially integrated communities which are strong, resilient and free of prejudice”.

Absent from this planned large scale (incremental) housing development are any policy requirements for participation from local communities in planning developments; requirements to replace like for like housing; requirements to protect tenancies or the right to return or to remain in the neighbourhood are entirely missing from these policies. Concerns regarding displacement long relevant to council housing estates might be expected to become more generalized: “In some cases, regeneration will include the loss and replacement of homes and it is important that any such scheme is delivered with existing and new residents and communities in mind. This is particularly pertinent for estate regeneration...” (4.10.3).

However, where redevelopments are piecemeal, site by site, and targeted at currently privately owned property, what will be the impacts, what will be the safeguards? This is likely to intensify the challenges of regular displacement, poor maintenance and insecurity faced by families in the private-rented sector; displacement of children from schools and neighbourhoods; loss of family housing replaced by smaller more profitable units. Section 2.10.6, for example, would be relevant to this intensification plan, as London’s neighbourhoods are “home to many established and varied communities” (p. 94). It could well be that this process will impact differentially on vulnerable communities, black and ethnic minority neighbourhoods – adequate protections and review of likely impacts of these developments is required prior to implementation. None of these obvious concerns are raised in the IIA (p. 139) which instead points to the need for (a) “further detail on the accompanying physical and social infrastructure, in addition to transport, that could help to mitigate adverse impacts of high density development” and (b) a spurious concern for conflict between Opportunity Areas and small sites for physical space – spurious because OAPFS and local plans will guide development in OAs. The IIA is not fit for purpose.

This ad hoc new policy is very far from being sound in terms of its ability to assess or provide evidence of its likely implications or impacts, and has potentially severe equalities implications.

Policy H2 F 5 suggest delete *non-self-contained housing schemes* from the list of exceptions because co-housing and other innovative forms of community-led housing could be ideal in some such cases.

Policy H2 H (affordable housing contributions: revise (i) to remove the borough discretion and (ii) to encourage boroughs to seek on-site provision where they can.

Policy H3 Monitoring housing targets

We support this policy but suggest that gross losses and gains of dwellings be monitored as well as net gains; square metres of loss and gain should also be

monitored.

H5 Delivering affordable housing

The key problem underlying the affordability crisis affecting Londoners is the price of land and the Mayor's priority should be to do all he can to slow land price (and that means house price) escalation. In our chapter on [Land Reform](#) (draft) for the next Community-led Plan¹² we have proposed the following:

The Mayor should be

- a. Lowering land price expectations by
 - (i) Enforcing upper density limits without flexibility
 - (ii) Enforcing his 35% affordability threshold without flexibility
 - (iii) Specifying the date at which 35% will become 50%
 - (iv) Making his definitions of "affordable" housing much more affordable, relating them to local incomes, not local market rents
 - (v) Applying his requirement of no net loss of social housing equally across all renewal schemes over which he has any planning or financial leverage
 - (vi) Require that TfL and other Mayoral-family lands that are disposed of for housing development are used substantially for social housing or other social purposes

These proposals are reflected and extended in the following:

H5 A starts by setting the 50% target proportion of 'affordable' homes in new schemes (in effect a target for sub-market housing at a range of 'affordability' levels). However this is not based on the evidence of the SHMA, which assesses the requirement over the 10-year period at 65% of the total requirement of 66,000 homes a year. As stated above, we consider that both these figures are underestimates. Government planning guidance as in the National Planning Policy Framework and subsequent detailed planning guidance, requires each Planning Authority to meet the full housing needs within its area. **The targets in the plan should therefore be amended to be consistent with the SHMA. This also applies to the targets for different types of sub-market housing and to targets in relation to the bedroom size mix of new homes. The target for low cost rented housing should be 70% of the 'affordable' housing target, with the target for intermediate housing being 30% of the 'affordable' housing target. A target that at least 30% of new homes should have 3 or more bedrooms should also be set.**

H5 B says "*Affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional*

¹² [Land Reform](#) download from JustSpace.org.uk/history

circumstances.

We propose the deletion of “...and mixed by tenure and household income...” because (i) most council estates in London are already quite mixed among long-standing residents, leaseholders and private tenants, (ii) this ‘social mix’ argument has long been used as a pretext to uproot what are perceived as working class communities and insert richer people, but rarely to insert working class communities into rich areas and (iii) we find it condescending and offensive when the argument is made that poor people need richer people to provide leadership or aspiration.

Policy H6 Threshold approach to applications

We support the basic concept of the threshold as an incentive on developers to bring forward more affordable homes.

The 35% threshold should be raised now to 50% and amplified to include the requirement that 70% of that ‘affordable’ housing must be low cost rental.

A second-best alternative would be for the Mayor to fix in the Plan a firm date (perhaps 2020) when the threshold would move to 50%, with a further increase possible thereafter. This would both help to dampen land speculation and encourage applicants to develop sooner rather than later.

Policy H7 Affordable housing tenure

We have always opposed, and continue to oppose the use of “affordable” defined relative to market rents. The word only has meaning when defined relative to incomes and the Mayor should make it clear that he will move to such an approach just as soon as government regulation permits. In the mean time social rent and London Affordable Rent are the categories which should have priority in planning to satisfy the most urgent needs identified in the SHMA. No public funds should be allocated to London Living Rent or Shared Ownership schemes. See our comment on H5 A above.

Policy H8 Monitoring of affordable housing

This is welcome. We would add a new subsection E requiring the monitoring of gains (and losses) of dwellings in each rental category as part of the monitoring process and requiring the Mayor to work with boroughs to ensure that agreed rental levels and tenure mixes are sustained in the long run by providers. This would be reflected in KPIs and the Annual Monitoring Report.

H10 Estate regeneration

A key planning objective should be to retain the existing stock of affordable/social rented housing and where there is estate regeneration this must result in a **net increase** of social rented housing, not simply “no net loss”.

Providing that the social/low rent and affordable housing criteria for the Threshold Approach H6 are tightened up as we propose at H6 above, we can see no reason why these schemes, if they meet this net-addition criterion as well, should have to go through the Viability Tested Route.

There is no recognition in this policy that the “regeneration” of London’s council housing estates has been an approach that has failed thousands of Londoners, depriving them of their homes and communities and replacing their homes with houses well beyond their means. Unless regeneration is community-led, with ownership and control over the process, the term is without meaning: what is happening is merely property development.

In all instances of estate regeneration, a systematic analysis of the total social, economic and environmental costs of demolition and redevelopment should be assessed compared to refurbishment of existing and some sensitive infill where supported by existing residents (as determined via a ballot). The principles of the circular economy must be observed in these analyses (see §3.1.11 in Design Chapter and our proposed additional policy there).

Policy should also refer explicitly to the potential for tenant-led / resident-led regeneration initiatives and to the need for resident participation in all estate regeneration schemes.

Policy H11 Ensuring the best use of stock

This is welcome but should be stronger.

Relevant powers lie mostly outside the planning system but should be referred to in the text. Local Authorities should be encouraged to make use of Empty Dwelling Management Orders and the Mayor should provide advice and support on this.

The Mayor should be much more active in monitoring and evaluating holiday and short-term letting and in working with other cities around the world on controlling the growth of this phenomenon.

H12 Housing mix

The presumption in this policy that there will be less family housing in central and urban locations, and therefore lower levels of social rented homes here, will only increase London’s spatial inequality.

H12 A6 the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in more central or urban locations

Re-word: H12 A6 the nature and location of the site. A mix of dwelling sizes, including family homes, at all rent levels is needed in all parts of London. Within each borough some locations will be more suitable for one and two bed units than others.

Proposed delete

H12 C Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.

The text argument in support of this policy makes much of the fact that there is no way to ensure that family-size homes are occupied by families. While that is clearly true, we should stress (i) that sharing groups of adults are a perfectly legitimate kind of household, (ii) that if family-sized units are available in the open-market stock then they are likely to be used by families for part of the building's lifetime at least and (iii) controls over size mix can be very important in the places where profitability considerations would otherwise encourage developers to focus only on small units. Boroughs which have sustained such policies have many contented leaseholder families who would otherwise have been unable to meet their needs in those localities.

H13 Build to Rent

The introduction of discount market rent further confuses and dilutes the need for genuine social rented homes. No evidence is presented about how large scale private rented developments meet housing need. Of further concern is that build-to-rent might be the target of vulture investments when blocks change hands. The role of the Mayor in monitoring and scrutinising build-to-rent needs to be made clear.

Standards of good property management, and by extension licensing schemes, should be applied to all private rented homes so that all private renters benefit from better conditions.

H13 B 7) the scheme offers rent certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked

Add at the end: and never exceeding CPI.

We consider this essential since a 'formula' could say anything. (We have in mind the formula –now discredited— in some residential leaseholds whereby ground rents were set to double every ten years.)

The subsection **H13 C** dealing with the Fast Track / Threshold approach needs to be amended in conformity with our suggested revisions to H6.

We are wholly opposed to public funds being used to support this type of housing, except for the social rent element in the affordable component of schemes.

POLICY H14 Supported and specialised accommodation...

...recognises that the provision of supported and specialised accommodation will need to address the needs of some groups on a multi-borough or pan-London level. However, this has not been the case under the previous London

Plans, despite assurances at previous Examinations in Public. This London Plan should specifically mention the housing, care and support needs of LGBT people, and perhaps other specific groups not yet mentioned in the policy. For example, the representations made by canal and river boat dwellers (a growing population) at “A City for All Londoners” have not found their way into the London Plan.

There is a need to strategically provide housing for our communities in all parts of the capital. We need more emergency housing, short and long term supported housing and move-on accommodation – including shared spaces for those who wish to live in LGBT-affirmative housing which is not available for many LGBT people, especially for older members of our communities.

H 15 Specialist older persons' housing

We support the proposal of AgeUK that this text should be moved into policy to give it more weight:

§ 4.15.2. Boroughs and applicants should recognise the important role that new, non-specialist residential developments play in providing suitable and attractive accommodation options for older Londoners, particularly developments in or close to town centres, near to relevant facilities and in areas well-served by public transport.

And to insert **and non-specialist** into the title of the policy.

We support the extremely thoughtful and (naturally) well-informed detailed proposals of AgeUK on the draft housing policies generally. In particular their emphasis on the potential contribution of the ground floors of conversions for those who seek non-segregated but accessible flats as they get older.

H16 Gypsies and Travellers

A table needs to be inserted in the London Plan based on the Borough targets in the Gypsy and Traveller Accommodation Topic Paper. Most important is to frontload targets for the first 5 years of the new London Plan and, to ensure these targets are met, Boroughs must prepare delivery-focused Local Plans which

- a) allocate a sufficient range and number of sites
- b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period
- c) enable the delivery of new pitches in Opportunity Areas and Housing Zones, working closely with the GLA.
- d) enable the inclusion of pitches as part of larger residential/mixed use development schemes

The Mayor will work with Boroughs and GT communities to undertake a London wide GTANA within the first 5 years of this plan, to form the basis of targets for years 6-15.

Audits of existing pitches and sites must be undertaken in close collaboration with site residents. The Mayor should produce guidance for undertaking such audits and do so in close collaboration with Gypsy and Traveller communities and their support organisations.

The GLA and boroughs must prioritise the safeguarding of existing sites. No replacement should be allowed without securing like for like accommodation in the same neighbourhood.

H17 Student accommodation

There are 2 distinct student housing markets – those run by the Universities offering lower rents and those run by the private sector charging higher rents. The rents charged by private providers are excessively high, ranging from £179 - £449 per week.

The evidence shows that affordability is an issue for the majority of students, including international students. There needs to be a remodeling of student accommodation, so that affordable rents below £168 per week are the norm (and ideally well below this). This can be helped by:-

- A definition of affordability for students, whereby when the rent is paid there is enough left from student maintenance loans and grants to cover the student's other costs. The 30% of net income that is a target for social rent and intermediate housing calculations should be applied to students. This way the definition is based on student means rather than the market rent.
- The Boroughs and GLA assisting the Universities with land assembly, to avoid scenarios where only high rent private sector schemes are coming forward.
- Placing a requirement on providers to deliver a fixed amount of affordable student accommodation; setting this target at 50% would correspond with what is expected of general needs housing schemes.

The body of 'students' is by no means homogeneous and the GLA should familiarise itself with some of the distinct needs of groups within the student body. For example, to achieve the aim of mixed and inclusive neighbourhoods the London Plan should address the specific needs of LGBT student communities. New student accommodation is being developed in Stockton for transgender students and similar initiatives should be on offer in London.

Chapter 5 Social Infrastructure

Reinstatement of Lifetime Neighbourhoods Policy

The Policies in this chapter do not give space to any community led activity and they lack an integrated and holistic approach. There must be a reinstatement of current London Plan Policy 7.1 Lifetime Neighbourhoods.

'Lifetime Neighbourhoods' provide definition and detail for inclusive and sustainable communities. They are places that meet the needs of a local community at all stages in its life, recognising health and well-being, social networks, a thriving local economy and a sustainable environment.

Lifetime Neighbourhoods are also important for fostering a sense of belonging, building networks of community organisations and enabling communities to thrive together.

The London Plan should have a social infrastructure matrix that relates number of housing units to lifetime neighbourhood indicators such as amount of green space, number of school spaces, number of GPs, number of community meeting spaces. This should be applied to the Mayor's Affordable Housing Programme and to all public land transfers.

Neighbourhood Plans are an important mechanism for the implementation of lifetime neighbourhoods and were included in the current London Plan Policy 7.1. They are a platform for communication and participation, with the potential to engage all groups in the design and delivery of planning policy and implementation. However a supportive framework is required to ensure that all communities benefit. Therefore, the Mayor should work with the Boroughs and voluntary and community sector to implement measures to support under-represented and excluded groups to take advantage of the Localism Act 2011 and especially the community right to bid and asset transfer schemes, community economic development, community right to build and community right to neighbourhood planning.

See DCLG Lifetime Neighbourhoods December 2011 and the earlier DCLG Lifetime Homes, Lifetime Neighbourhoods.

POLICY S1 Developing London's social infrastructure

The protection of social infrastructure is a critical concern for London's communities and included within this are a wide range of community spaces which are the fabric of London's diversity.

Whilst Policy S1 recognises this important role, it does not evidence and base policy on the escalating loss of social infrastructure, particularly community space.

Policy S1 does not, but should, apply the principles of Policy GG1 Building Strong and Sustainable Communities which aim to ensure growth reduces inequalities and improves the quality of life for all Londoners by

- providing amenities that strengthen communities,
- increasing active participation
- planning for places where amenities can flourish and that provide important opportunities for social interaction
- taking advantage of the knowledge and experience of local people

Just Space and The Ubele Initiative produced and shared with the Mayor a manifesto for community spaces (“Reclaim Our Spaces”), and it is disappointing that these proposals have not been taken into account in Policy S1. These include:

- Recognise the irreplaceability and uniqueness of many community spaces and look after them for future generations as part of a continuing legacy
- Access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and well being, inclusion, integration, empowerment and poverty reduction
- Social infrastructure and community spaces are essential to the achievement of lifetime neighbourhoods in which services and amenities are accessible and affordable to everyone, now and for future generations, and provide space for social co-operation and mutual aid,
- Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.
- The tool of Social Impact Assessment to gather evidence of community assets, including social infrastructure, with a methodology that ensures local community networks are fully involved through a collaborative relationship with the Boroughs and GLA. See Just Space Towards a Community Led Plan for London (2016) and Just Space policy document Social Impact Assessments (January 2018).

The principles above need to be inserted in Policy S1 A – F.

In **Policy S1 B** social infrastructure needs are only addressed via traditional Borough planning mechanisms and the community scale is secondary or non-existent.

In **Policy S1 C** the wording makes it seem that it is the physical building alone that determines quality and inclusion, ignoring social agency.

Policy S1 D encourages and supports the disposal of public sector estates with social infrastructure rationalised or facilities shared. We consider that the best use of public land is to meet social objectives; services and amenities that meet community needs should not be secondary.

In **Policy S1 E**, it needs adding that new facilities must be fully accessible (including step free), affordable and welcoming to all potential users.

In **Policy S1 F**, development proposals that may result in any loss of social infrastructure must be assessed by local communities (using the community tools identified above) so that “public service transformation plans” are fully responsive to community needs. Re-provision must be on the same terms and conditions (like for like).

Policy S2 Health and social care

Policies A1 and A5 are about the disposal of NHS buildings and land, with the language of estate strategies, service transformation plans and reconfiguration of services. This is very much a policy for the business needs of the NHS.

Good Growth Policy 3 has not been followed through and the Mayor’s Health Inequalities Strategy has not been given spatial expression in the London Plan. Policy S2 has very little to say on preventative health and social prescribing.

Furthermore, the business model approach of Policy S2 marks a departure from the current London Plan Policy 3.2 Improving Health and Addressing Health Inequalities. This emphasises the power of the Mayor to coordinate Investment and planning to improve health and recognises the role of the planning system in responding to the social determinants of health. It also promotes evaluation of the impact of development proposals on health and health inequalities through the tools of Health Impact Assessments and the Mayor’s Best Practice Guidance on Health Issues in Planning.

Policy S2 refers to a number of health structures and mechanisms, such as Sustainability and Transformation Plans, which are without community involvement. And yet Public Health England refers to extensive evidence that connected and empowered communities are healthy communities. The Mayor has the power to address this and a policy change is needed. The Mayor should require CCGs to resource community organisations in the context of social prescribing.

Policy S2 must show awareness of, and address the differentiated needs of, diverse groups and encourage Boroughs and the NHS to include the full range of specific needs in the Joint Strategic Needs Assessments (JSNA). Examples are:

- Victims of Domestic Violence (DV) need access to both refuges and to suitable move-on accommodation. The stability created by having suitable accommodation has considerable positive health impacts for women and children whose lives have already been traumatised by their experiences.

- Cuts to children's centres, youth clubs and play spaces across London contribute to child obesity and depression. We support the aspiration of the *Alliance for Childhood London Forum* to make London a Child Friendly City and this requires all of the proposals in this chapter to be looked at from a child's point of view.
- The Mayor to champion accessible and inclusive health services and to use his power to elevate groups who are being excluded, like Gypsies and Travellers, migrants, refugees and the BME community.

Policy S2 should include a “healthy places” requirement on Boroughs and developers. Suggested wording is as follows:

A space is healthy

- a. Because it has a **healthy mix of opportunities, economic, social and environmental, to express healthy behaviours**
- b. According to the **cultural specifics of a community** and so needs to incorporate opportunities for different communities to express themselves in an integrated and complementary way.
- c. When it has the **capacity to experience growth in ways which are harmonious** as determined by its inhabitants and which accord with agreed requirements for sustainability, public health and social justice.

The reason this is required is that the rupturing of healthy places has important impacts on health. Across London many communities are being displaced and there is a lack of research on the extent of this and the impact displacement is having on people's health, as well as the particular impacts on protected groups. A survey in Camden showed 70% of those displaced were BME.

Policy S2 should also require High streets and town centres to contain a drop in health advice centre that is welcoming and accessible to all borough residents, and that offers NHS primary health care guidance, phone up schemes and a wide range of leaflets advertising local health provisions, all coordinated with Healthwatch and local community networks.

These proposals are taken from the Just Space [Health Policy](#) document (January 2018).

Policy S3 Education and Childcare

As with health, the promotion of educational facilities is business driven and does not combat the issues of poverty and inequality. The contribution that supplementary schools make to increasing the self confidence of children from minority ethnic communities, grounding children in their heritage, tackling social ills and increasing the Black child's access to higher education should be recognised by the Mayor. Proposals could resolve some of the challenges they face (such as inadequate premises). The Mayor could enable their

access to mainstream education establishments, politicians and the business community. There are linkages with policies E3 and E11.

Whilst we welcome the inclusion of childcare, there are no targets, despite the major shortfall in provision identified in paragraph 5.3.3. An audit of existing provision needs to be undertaken, with assessments of need, so that the Borough is in a position to plan for childcare services. The criteria for childcare provision need to take account of accessibility and affordability.

The policy on healthy routes to school needs to include proximity. The closer their home is to school the more likely children are to walk or cycle. This is a further example of the benefits of looking at policy through the lens of lifetime neighbourhoods.

The Mayor has direct responsibility for Further Education Colleges which require a distinct policy.

Policy S4 Play and informal recreation

There should be consultation with children and young people in the design of play provision to understand their needs. Policy B5 would be better if the onus was on maintaining existing play provision (rather than no net loss) or replacing it like for like.

The accessibility of Policy S4 is not helped by high level language such as independently mobile and incidental play space. There are references to safe and independently, but for younger children there needs to be contact between home and play space, so that parents can see them.

The following should be included in the policy:

- Supervised and non-supervised play
- Play as an important part of childcare
- Links between play and health, housing and safer streets
- Turning streets into places for permanent play
- Natural play is important
- The recommended distances to play facilities for different age groups should be spelt out.

There should be more cross-referencing to play throughout the London Plan. For example, in D3 Inclusive Design and T2 Healthy Streets where play is not mentioned.

Both Policy S3 and S4 are ignoring issues important to local communities, like school playing fields and informal spaces. These can be lost because they are listed as brownfield sites. New schools have to consider how close to a park they are, so they don't have to make playing fields provision, but school children shouldn't have to walk down the road and cross a busy street to get to their playspace at break time. Some schools are putting playgrounds on

the roof, which is again unacceptable – children should have access to the ground level for their play.

Policy S6 Public toilets

We support the issue being included, but public toilets need to be widely available, not only in major commercial developments. They are a social asset and the lack of easy access to public toilets is a barrier to going out and increases social isolation.

The policy should be amended to apply to medium sized developments, all supermarkets, all eating places, and all transport hubs (underground stations and bus interchanges).

The text recognises these are a vital facility, so requirements must be placed on Boroughs and not just businesses. Local Plans should be required to set a target for free, safe, accessible and clean public toilet provision and the boundary maps for designated town centres should show their location. Boroughs should also be encouraged to introduce Community Toilet Schemes, where businesses make toilets freely available to the public during trading hours without a requirement to purchase (see Richmond and Merton Borough Councils).

The specifications in 5.6.3 and 5.6.5 should be included in the policy box to ensure that a wide range of needs are met by the toilet facilities.

Chapter 6 - Economy

Overall comments:

There is still a lack of understanding of what happens on the ground for the vast part of London's economy. There are major omissions – for example no policies on high streets or the main arterials which they compose. Overall, the understanding of London's economy, particularly at local level is still very fragmented – spatially, in terms of the relationships between sectors and activities and finally in terms of building typologies which meet the requirements of local actors for adaptable space in useful proximity to other small business.

Policy E1 Offices

The approach to office-to-residential Permitted Development Rights is not sufficient to protect low cost office space - E1 points E and F refer to 'unique agglomerations of world city businesses' (CAZ, Northern Isle of Dogs, Tech City etc), and viable strategic and local clusters (in business parks and town centres). What falls outside these categories (e.g. on parts of high streets not included in town centres) is not recognised. Again, it is important to note that major arterial routes, access to which is used to justify many kinds of development e.g. supermarkets, are often composed of sections of high street. As such, they form a continuum of commercial use that's very adaptable.

Point D – encourages to consolidate and extend where viable office markets in outer and inner London; this needs to be carefully monitored so it does not result in the release of low cost units which are outside business parks and town centres.

Point E – there seems to be a contradiction in the policy, as it encourages the use of Article 4 Directions but also releasing surplus to other uses. This is reinforced in Point G which requires development proposals to support the change of use of surplus office space to housing. The London Office Policy Review indicates that surplus office space contributes to enabling growth and adaptation of businesses. The evidence also shows that SMEs have been most affected by changes of use to residential through Permitted Development Rights. Therefore the policy needs to provide stronger protections to prevent the further loss of low cost office space, particularly outside the CAZ and high value clusters.

Proposed change:

G Development proposals should:

- 3) support the redevelopment, and intensification of surplus office space to increase the provision of low cost and affordable units

Policy E2 Low-cost business space

Low cost space is defined as secondary and tertiary commercial space – back of town centres and high streets, railway arches, heritage buildings in the CAZ

and small scale provision in industrial locations. However, the policy only refers to B1 business space; it should therefore be extended to B2 and B8, as well as space for other types of activities (e.g. street trading) to include all economic sectors that might operate in these locations. The provision of low cost workspace needs to be included as a separate KPI in the Monitoring chapter.

The replacement/re-provision of existing low cost space is very problematic. This policy needs strategic oversight from the GLA and Boroughs to ensure the assessments and conditions are applied rigorously and meet the needs of existing businesses with minimal negative impacts.

The threshold of 2500sqm in Point C should be reduced to 1000sqm to increase opportunities of providing flexible workspace. 'A proportion' should be defined to enable minimum standards and monitoring. We propose at least 10% or higher if justified by local circumstances. These changes are in line with many Borough Local Plans.

In light of growing interest from all parts of the development industry in multi-use sites & mixed-use, there is surprisingly little commitment to investigating typologies that facilitate mixed use & effective, convenient subdivision. One current tendency is towards tall, flatted structures. Another is towards horizontal and lightweight structures. Both forms prefer separation from nearby buildings. Both types aim at as much internal openness as possible. New development has not met the challenge of providing for subdivision/assembly and division/extension of ownership - in other words, genuine, small-scale flexibility that points to conventional land plotting.

Proposed changes

A The provision, and protection of a range of low-cost work space (defined to include B1, B2 and B8, retail and street trade) should be supported to meet the needs of micro, small and medium-sized enterprises, small branches and other organisations and to support those wishing to start-up or expand.

B Development proposals that involve the loss of existing low cost work space in areas where there is an identified shortage of lower-cost space should:

- 1) demonstrate that there is no reasonable prospect of the site being used for business or other kind of work purposes, or
- 2) ensure that an equivalent amount of low cost work space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses, or
- 3) secure suitable alternative accommodation (in terms of type, specification, use and size) in reasonable proximity to the development proposal and, where existing businesses and other organisations are affected, that they are subject to relocation support arrangements before the commencement of new development.

C Development proposals for new work space floorspace greater than 1000 sqm (gross external area) should consider the scope to provide at least 10% (or higher if justified by local circumstances) flexible workspace suitable for micro, small and medium sized enterprises and small branches etc. Flexibility should include hybrid work space (between use classes), layout, design, fit out and other specification to suit a diverse range of activities

Add new point:

- Boroughs in their Development Plans are encouraged to consider zoning policies for the protection and increased provision of low cost workspace and complementary strategies such as rent control, secure and long terms tenancy etc

Policy E3 Affordable workspace

Affordable workspace is defined as 'maintained below market rates' for specific social, cultural or economic development purposes. The KPI only refers to B1 uses. The definition needs to be expanded – to include other uses; to set a percentage or range of percentages to define 'below market rent'; to specify that the cost should apply to the end users/occupiers, not just the workspace provider; that the workspace will be affordable in perpetuity¹³.

Point C - Should be tightened to give guidance to Boroughs on how to assess need; viability should be treated in the same way as for affordable housing i.e. scrutinised by the GLA team

Proposed changes

A In defined circumstances, planning obligations should be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:

- 2) dedicated for specific sectors that have cultural value such as Migrant and Ethnic businesses, artists' studios and designer-maker spaces
- 3) dedicated for disadvantaged groups starting up in any sector (including for example, those sharing characteristics protected under Equalities legislation, businesses and trades which have difficulty in securing premises at market rents)
- 5) supporting start-up businesses or regeneration (understood in the broader terms across sectors and activities)

B Particular consideration should be given to the need for affordable workspace for the purposes in part A above:

- 1) where there is existing affordable or low cost workspace on-site

¹³ See for example Ferm, J; (2014) Delivering affordable workspace: Perspectives of developers and workspace providers in London. **Progress in Planning** , 93 , Article C. [10.1016/j.progress.2013.05.002](https://doi.org/10.1016/j.progress.2013.05.002)

- 2) in areas where cost pressures could lead to the loss of affordable and low cost workspace for micro, small and medium-sized enterprises, small branches, social purpose businesses
- 3) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.
- 4) On high streets, arterial routes partly composed of high street sections (e.g. A1) industrial estates, office locations identified in E1 and E4
- 5) in locations where affordable workspace is necessary to spread out economic opportunity and fairness and to take advantage of unknown entrepreneurial energies;
- 6) in locations where there have been losses of low cost and affordable workspace.
- 7) where proximity of decent transport, concentrations of young people, some existing and variegated working buildings provide a plausible setting for additional workspace

C Boroughs, in their Development Plans, should consider more detailed affordable workspace policies in light of local evidence of need and viability. Viability should include as a major indicator longevity of business use in a particular location. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace.

D Affordable workspace policies defined in Development Plans and Section 106 agreements should include ways of monitoring that the objectives in part A above are being met, including evidence that they will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage to ensure that the space is configured and managed efficiently. The GLA will also monitor the overall implementation of these policies, as indicated in the Monitoring chapter.

Policy E4 Land for industry, logistics and services to support London's economic function

There is a lack of vision around the opportunities for growth of the industrial and logistics sector (beyond simply servicing London's growth). The title of Policy E4 itself (Land for industry, logistics and services to support London's economic function) suggests a rather unambitious role for industry in London. The London Plan should play a significant role in complementing the forthcoming London Industrial Strategy, particularly in achieving fairness for sectors and activities which are essential to London's everyday economy. We have started developing a community led vision for the Industrial Strategy

which sets out key principles and propositions¹⁴. For example, the London Industrial Strategy and the London Plan should be aligned in prioritising the protection and increase in capacity of diverse, low cost, suitable workspace, as a driver for fairness, productivity and environmental sustainability. A place-based approach to the London Industrial Strategy should support a fair spatial distribution of diverse workspace in diverse locations and settings across London.

There is a lack of transparency around the calculations for industrial accommodation capacity moving forward. The Plan does not seem to take a similar approach to that for housing. For housing, we look at future demand and backlog in order to identify annual targets. More clarity in the plan on future demand required. There should be annual targets for industrial capacity provision.

The London wide application of the policy is too broad and allows for easy manipulation and double counting. Site based 'nil net loss' policy (with some exceptions) would be stronger and easier to manage/implement/monitor.

Designating individual boroughs as 'retain', 'provide', 'limited release' may not be helpful. Demand for industrial does not follow borough boundaries and providing *any* new industrial land and accommodation is going to be difficult. We should strive for additional capacity wherever we can get it rather than effectively discourage most boroughs from providing new capacity.

Part E talks about the fact that any release of industrial capacity for residential should be in locations that are (or are planned to be) well-connected by public transport. But most of the boroughs/locations where limited release is allowed/proposed (in East London) are in those locations where access by public transport is poor and there is inadequate provision in the pipeline.

Principle of no net loss does not apply to sites previously used for utilities/transport infrastructure (para 6.4.5). These sites might be good sites for other industrial uses. There is a lack of acknowledgement of how hard it is going to be to identify additional capacity for industrial moving forward.

Proposed changes

A A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained. This should make provision for:

Add 10. Building material supply and equipment hire and servicing uses
A large and crucial category, the most notable omission, so worth adding in

¹⁴ <https://justspacelondon.files.wordpress.com/2018/01/just-space-industrial-strategy-chapter-draft.docx>

Add: Boroughs should carefully audit industrial activity and map industrial accommodation across their area, and in their Development Plans should clarify the planning status of all industrial sites, refining policies maps and introducing designation where appropriate.

An audit and map should be a normal part of plan preparation, but it is not. For the London Plan to require that would be a huge step forward. Clarifying status is the essential job of Development Plans, but most boroughs are not doing this.

Point C The retention and provision of industrial capacity across the three categories of industrial land set out in part B, and in mixed developments elsewhere, should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (measured to include operational yard space capacity) within designated SIL, LSIS and Non-Designated Industrial Sites. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

The *measured to include* part is crucial as yards can be substantial, in some cases the entire site. Provision beyond current industrial areas should be clearly encouraged. Adding in Non-Designated Industrial Sites is a big change, one that is crucial to make a plan that does its job of seeking to meet identified needs. The GLA has produced strong evidence that nil net loss of industrial accommodation is what's required to reduce the damage that constricting supply of accommodation will have on the industrial accommodation.

Point D The retention and provision of additional industrial capacity should be prioritised in locations that:

1. are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport
2. provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population
3. provide capacity for micro, small and medium-sized enterprises, and small branches.

This should not be prejudiced against small branches of larger businesses.

4. are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision.

Point D – other locations should be added that acknowledge existing provision, access to local and other supply chains, and are related to local employment (both existing and new jobs)

Point F - Delete 'efficient', or explain how it is defined in terms of meeting needs, supply chains etc

Point G - delete 'where appropriate'

Point H Development proposals for large-scale (greater than 2,500 sqm GIA) industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs and small branches, in particular where there is a local shortage and demand for such space.

Policy E5 Strategic Industrial Locations (SIL)

The 'main reservoir' phrase is a residue from the days of advocating release of much of the non-SIL industrial land. SIL is only 50% of industrial capacity. Non-designated industrial land which is 36% of industrial capacity occurs in more fine grain urban settings and is at high risk of being lost or released for residential uses. However, the policy should be much stronger in seeking to retain SIL wherever possible. In previous iterations of the London Plan, and in the 2012 SPG, this was clearer, but now it appears that London boroughs are being encouraged proactively to identify the scope for intensification/co-location etc in defining their SIL boundaries. This opens the door for huge loss of SIL. Some industrial land does need to be protected from residential encroachment, purely for operational purposes.

Coordinated masterplanning processes if not integral to Development Plans are a route to unfair planning, frequently done in violation of Gunning principles defining fair consultation.

SIL has been tightened to exclude non-industrial uses (including retail, places of worship, leisure and assembly uses), with no assessment on the impact on these other uses. The purpose of the tightening of SIL uses in order to increase capacity for industrial to meet demand moving forward is sound. However, it appears that again the driver for this is accommodating as much new residential as possible. There is no consideration given to the overall crisis of accommodation across London for a variety of non-residential uses, where to date SIL and other industrial land has provided relatively affordable and accessible accommodation. It should be noted that SIL often overlap with areas of high deprivation and low income communities. There is an opportunity for SIL to achieve the principles of Lifetime Neighbourhoods and Lifetime Suburbs if they accommodate social rented housing for low income workers, local shopping and affordable amenities and other facilities needed to sustain strong and inclusive communities. Excluding places of worship from SIL is likely to have a significant impact on ethnic minority groups.

B 3) Concern that the drive to make more efficient use of land – and the reference to Opportunity Areas and working with local authorities outside of London can lead to further loss. There is no cross-referencing to Policy SD2 Collaboration in the Wider South East which mentions the scope for substitution of industrial capacity where mutual benefits can be achieved (i.e. move industry outside of London to accommodate housing)

Point E – welcome the Agent of Change principle – the onus is on new residential development near SIL to ensure industrial activities are not affected

Proposed changes

A Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.

D Development proposals for uses in SILs other than those set out in part C above, should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan. The provision of social rented homes, affordable retail, places of worship, other amenities and functions central to the social and economic sustainability of low income communities will be supported in order to achieve Lifetime Neighbourhoods in close collaboration with existing residents and businesses.

Policy E6 Locally Significant Industrial Sites

Boroughs need to designate land that is not currently designated because it was thought it did not matter (could all be got rid of). The change of strategic policy, to no net loss, now requires fresh designation, not just refining boundaries of already designated land.

Proposed changes

A In their Development Plans, boroughs should:

1. designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies and maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function) - *other evidence such as local economic audits should be used to support LSIS boundary designation and understand links to wider local employment, supply chains etc*
2. make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for

SMEs and small branches and distinguish these from local employment areas that can accommodate a wider range of business uses.

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

Intensification and consolidation – this needs to be carefully defined; Point B suggests the purpose of intensification is to support the delivery of residential and other uses, but E 1 requires to increase provision of industrial capacity. Welcome that it is a plan driven approach rather than left to individual planning applications. Planning at the SIL/LSIS level will require a solid and fine grain understanding of local business profiles, needs, interactions, links to the neighbourhood and wider area etc.

The aspiration is undermined by the large-scale potential loss of non-designated industrial sites (see above), which tend to anyway be more intermingled with other uses in various urban typologies.

The policy needs to differentiate between intensification (mixed use) and intensification of industrial uses (via multi-storey etc). Presumably the latter could be encouraged on SIL/LSIS but also on Non-Designated Industrial Land, whereas mixed use intensification is presumably not to be encouraged everywhere and would require a plan-led approach. The co-location of industrial and residential won't work in all cases and could undermine the integrity of SIL; the plan needs to be clearer on this.

Point D should be encouraging mixed use over residential, not suggesting that the two are interchangeable. It should also be more prescriptive about the type of uses to be accommodated in 'mixed use' and the priority for industrial uses currently on site to be accommodated on site. Secondly, the wording of this policy is very encouraging to developers and will result in much release of non-designated industrial sites. Point D does not provide sufficient protection to non-designated industrial sites, especially as these are not covered by Policy E4. We are concerned about the differential approach – mixed use/residential is allowed via planning applications in this case, rather than keeping a strategic oversight.

There is no evidence of the *viability and deliverability* of the intensification policy. The Plan requires the development industry to bring forward proposals without providing clear incentives. There will be implications for delivery – e.g. land ownership (for example, small scale ownership better facilitates small scale commercial activity. Land assembly doesn't help this) and other constraints; impacts and costs to existing businesses; management of new spaces.

The policy of substitution should be a separate policy, with a clearly defined strategy requiring collaborative working. It is not similar to intensification or co-location and only serves to suggest that this is all part of a strategy to

facilitate residential development. Perhaps local authorities outside London who are willing to accommodate more industrial uses should be encouraged to do so in order to provide additional industrial capacity (rather than facilitate substitution). Substitution should also be framed as an issue of regional development i.e. a move to offset London-centric growth: it is not just a matter of releasing land within the London's planning sphere to residential. Spreading industrial activity will bring upskilling benefits and other economic reinforcement to receiving areas.

The participation of businesses in the plan making process and delivery will be crucial – policy needs to identify adequate resourcing for this.

Proposed changes

B (...) This approach should only be considered as part of a plan-led process of SIL intensification and consolidation (with the areas affected clearly defined in Development Plan policies maps) supported by a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, that closely involves relevant businesses, and not through ad hoc planning applications.

Masterplanning processes should support and feed into Local Plan preparation, as LP preparation has a reasonably fair process (staged consultation, independent inspector etc). Masterplanning process is not an acceptable option, that opens the way to breaches of Gunning principles. Businesses should be asked, involved, consulted.

C (...) This approach should only be considered as part of a plan-led process of LSIS and Non-Designated Industrial Land intensification and consolidation (clearly defined in Development Plan policies maps) or as part of supported by a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, that closely involves relevant businesses, and not through ad hoc planning applications.

Remove Point D to ensure similar protection and support for Non-Designated Industrial Land.

Policy E8 Sector growth opportunities and clusters

This policy should reflect the commitments to economic fairness in the Good Growth policies and A City For All Londoners, beyond the high growth sectors identified in the Economic Development Strategy. Point A should be changed to support businesses and employment across all sectors –not just a diverse range, to mirror the text in 6.8.1. This policy should complement the forthcoming London Industrial Strategy; Just Space has started to develop a

community-led vision¹⁵ which places economic fairness and seeking to achieve socio-economic equality at the heart of this strategy.

The focus in the EDS is on advanced urban services, culture and creative industries, financial and business services, life sciences, low carbon, tech, tourism. The policy should recognise relationships and interdependencies across sectors and how these will be supported to increase productivity in low pay occupations, ensure innovation and other benefits are accessed by sectors and activities that are usually ignored etc. The Circular Economy imperative to which the Mayor is committed can only be realised through the interaction of firms.

A significant proportion of start-up business owners are from ethnic minority backgrounds. These businesses often provide important spaces for social interaction, support networks and community cohesion and they play a vital role in giving communities and new arrivals local identity and a sense of place. They foster a spirit of entrepreneurship and are significant local employers who help to address the disproportionate economic and social inequalities facing many ethnic and migrant groups. However, in very many cases regeneration has resulted in the displacement of Ethnic and Migrant Businesses. The same businesses also face insecure tenures and a lack of support from local authorities, coupled with the usual pressures of business readiness, the upkeep of premises, language barriers and having to compete with chain stores.

Point C Rephrase:

The evolution of London's diverse sectors should be supported: the challenge of economic development is that the future is unknown and that the best plan for it is diversity. Boroughs should in Development Plans ensure the availability of suitable workspaces including:

The list should be expanded to include other workspaces mentioned in the previous policies – low cost, industrial, studios etc.

Point E – should include securing apprenticeships and training opportunities through existing higher and further education institutions and through their growth/expansion

Point F – clusters should also include Migrant and Ethnic Business clusters e.g. Elephant and Castle, Seven Sisters etc. Research from Suzanne Hall on superdiverse high streets demonstrates that such clusters are essential in ensuring stability and social resilience in the face of rapid demographic change and local losses of secure blue-collar work.

¹⁵ <https://justspacelondon.files.wordpress.com/2018/01/just-space-industrial-strategy-chapter-draft.docx>

Point G – introduces the concept of Strategic Outer London Development Centre with one or more specialist functions of greater than subregional importance. Implementation mechanisms include Local Plans, Opportunity area Planning Frameworks, but also management and investment including Business Improvement Districts. There is a concern regarding the approach to picking specific sectors – without a good and fine grained understanding of local economies, particularly relationships between businesses and the wider neighbourhood. Some Outer London BIDs are located on high streets or in town centres and comprise a mix of different functions, activities, services, amenities; similarly for Industrial BIDs. They require a more holistic and inclusive approach. There is no mention of public participation and scrutiny of these SOLDCs, which is essential to ensure they would meet existing needs.

Policy E9 Retail, markets and hot food takeaways

A policy point should be added to ensure the protection of existing retail and markets in line with previous policies (e.g. offices and industrial land) – particularly in terms of low cost, adaptable, accessible units particularly on and around high streets. There should be a reference to the evidence and recommendations in the ***High Streets for All*** report commissioned by the GLA. This indicates that around 70% of high streets are under threat because they don't have planning designations. The focus solely on town centres in the policy undermines the contribution and needs of high streets and surrounding spaces.

The policy should include mentions to migrant and ethnic retail, particularly where it refers to 'specialist' shopping, markets etc., in line with suggestions made for Policy E8.

We are concerned about Point C and D on restricting hot food takeaways near schools. For many low income families, particularly those in in-work poverty, takeaways are often the only affordable option for children and young people to have hot meals. The rise of zero-hours contracts and single parents working two or more jobs means children are reliant on cheap, fast food, of a high calorific value. 'Hot food takeaways', covers not only "chicken shops" but probably also applies to kebab shops, fish and chip shops, Chinese, Indian, African and Caribbean take-aways, primarily owned and staffed by minority ethnic traders and a source of food for night time and support service workers. This policy should look at the entire food system in which such shops sit: the supply chains, the alternative employment possibilities, the impact on where the 'school pound' is spent alternatively, the local economies.

If an analysis were to be done of the areas in which 'hot food takeaways' appear at a greater density, compared with the middle class/higher income alternatives such as delicatessens and bakeries and patisseries, charcuteries, tobacconists and wine sellers, it would be fair to make a similar argument in relation to their contribution to poor health outcomes of their main users; but

there seems to be no focus on the lifestyle and health practices of privileged groups in the London Plan.

For many small businesses especially of migrant and ethnic ownership hot food takeaways are a low cost start-up space that enable local enterprise and employment. They should be supported and resourced by the GLA and London Food Board to meet the criteria in the Healthier Catering Commitment. Corporate competition to independent hot food takeaways, particularly chain supermarkets, doesn't usually offer an adequate low cost source of hot food, which reinforces inequalities for the most disadvantaged.

Before this policy is implemented there is a need for careful impact assessment of the implications and opportunities this has for the affected communities.

Proposed changes

Add new points:

- Recognise and protect street and covered markets as a) a source of healthy and cheap food and other goods b) a social benefit c) a source of independent business and local supply d) providing local employment e) an opportunity for start-up businesses. Local authorities should seek to retain control of management and rent-setting and must consult with traders and customers on future proposals. The London Plan should include a database of protected markets.
- Protect clusters of small and independent businesses and ethnic and migrant traders which have a unique and irreplaceable character and assist communities to be resilient in the face of rapid change, particularly in areas undergoing regeneration and growth
- Encourage the start-up of community food hubs which are located in Town Centres which work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food waste, and addressing food poverty, providing a variety of skills to encourage localised, self-reliant developments within each borough.
- The number of high street retailers which sell a wide range of fresh foods (grocers, fishmongers, butchers, bakers) should be encouraged by each borough and not include corporate chains which sell fresh food more expensively and therefore less accessibly to low income and precarious earners. A quota of high street premises can be safeguarded for such outlets.

Point C – delete

Point D – Where development proposals involving A5 hot food takeaway uses are permitted, the operator should be supported to achieve, and

operate in compliance with, the Healthier Catering Commitment standard through working in collaboration with the GLA, London Food Board, local authority and other stakeholders.

Policy E10 Visitor infrastructure

Point G – does not ensure a similar accessibility standard as for residential development. This should be changed to reflect the requirements of Policy D5 Accessible housing.

Proposed change:

G To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide:

- 1) at least 10 per cent of new bedrooms to be wheelchair-accessible;
- 2) all other rooms to meet the standards for 'accessible and adaptable dwellings'

Policy E11 Skills and opportunities for all

This policy and its text are, as expected, very narrow – with a focus just on training and hiring obligations in S106 agreements on new developments, especially for construction jobs. The policy should apply more broadly to all employment and business opportunities created through new development, not just construction.

There should be KPIs to monitor the implementation of this policy, particularly the three points that relate to training and apprenticeship completions, take-up of employment opportunities and increasing the proportion of under-represented groups.

The policy should be linked to proposals in the Mayor's Good Work Standard and Economic Development Strategy related to pay, work conditions, opportunities for job progression. Given the Good Work Standard is the main initiative to implement the Mayor's economic fairness agenda, this should feature in all economy related policies. The Good Work Standard needs to address the challenges facing businesses and organisations in the low pay sectors, particularly those in the foundational, social economy and charitable sector. The Mayor needs to ensure that its benefits can easily reach those small businesses and organisations which are most in need of rises in productivity, employee equality and wellbeing. In doing so, particular consideration should be given to the challenges facing these businesses in terms of the severe workspace accommodation crisis particularly in high street and industrial estate settings, which is causing increasing rents and displacement of businesses.

Proposed changes:

Add new points:

- the Mayor will support businesses and organisations in the low pay sectors, foundational economy and charitable sector to sustain and create new local employment opportunities across London's neighbourhoods, through ensuring access to low cost and affordable work space and providing dedicated resources for the implementation of the Good Work Standard
- Development proposals in Opportunity Areas, Housing Zones and Mayoral Development Corporations must ensure that new jobs created meet the requirements of the Good Work Standard

Chapter 7 Heritage and Culture

Policy HC 1 Heritage, Conservation and Growth

It is not possible to think of the spatial planning of London, with respect to heritage and culture, without factoring in the heritage and culture of the diverse populations who have made parts of London their own and conferred unique cultures of trade, music, arts and food, unique to them and shaping the way in which a place is understood.

It is therefore quite wrong to speak of the historic culture and heritage of London without referring to these things, yet this is what this chapter has done. It sets the tone for a 'development' of London which ignores the culture of its current citizens and treats history, the idea of heritage as a history that is now dead and past, not as the living culture and heritage that continues.

This raises significant questions. What is culture and who is culture for? Who decides what is worthy of cultural and heritage protection? Do the sites listed in the London Plan provide a fair representation of all cultural practices and spaces in London?

The policies in this chapter must reflect a shared heritage, open and accessible to people of different ages, genders and cultures. The lack of understanding of community grassroots culture has led Just Space, in conjunction with UCL, to develop a framework for auditing cultural and community assets at a local, neighbourhood level and to do this in a way that deepens our awareness of the challenges they face.

Changes

Add to B4 "in a manner which reflects the local values of all communities which have helped shape its heritage value."

Add to E "in consultation with local community representation" and collaboratively set out strategies.

To the series of maps in this section a further map should be added: to indicate those community assets which contribute to the place-making of a location(s) within London, identifying those which are under threat and those which have disappeared in the last five and ten years. Tools for consulting communities are available to provide place based knowledge for identifying and making visible the diversity of cultural and heritage assets so that they are fully incorporated into future planning and decision making. These include participatory mapping that ensures local communities of place and identity are fully involved. (see Just Space /Just Map collaborations)

Map of community assets in Tottenham :

https://justplace.carto.com/viz/5a7af762-1604-11e7-a420-0ecd1babdde5/embed_map

Map of community assets in South-Kilburn :

https://justplace.carto.com/viz/07d68176-7504-41cc-9362-7bf651971215/embed_map

Map of community assets in Walworth:

https://justplace.carto.com/viz/39b94702-92db-44cf-80c5-1b0678612066/embed_map

Policy HC 2 World Heritage Sites

The concern is with iconic cultural venues, great culture, world class culture. There is a need to recognise alternative and multi-cultural forms of heritage. For example, Chinatown, Soho, Seven Sisters, Latin Elephant, Brixton, Ladbroke Grove, Shepherds Bush, Brick Lane, Southall.

Policy HC1A stresses “conserving”, “enhancing” the heritage assets, and “improving access to” them. The plan should clearly demonstrate how the above would be measured and understood. Moreover,, the plan aims to protect existing culture venues (HC5A) but this can often come into conflict with other policies such as HC7.1.6 which proposes that cultural venues can be enhanced or creatively used. More attention must be given to ensuring harmony between policies. It is essential to stress a balance between recognizing social value and creating business opportunities. The latter should not impinge on the former. Greater thought should be given to the accessibility of heritage and cultural sites to ensure that they remain open, inviting and accessible to all members of society, regardless of ethnicity, gender, ability or sexual orientation.

Policy HC5 Culture and creative industries

This policy encourages the boroughs to evaluate unique and important cultural assets. There is no specification of what forms of activities should be encouraged, though there is an emphasis on the business driven aspects of cultural consumption for economic growth purposes and tourism which is limiting.

Little attention is given to matters of community inclusion and participation. There is a need to instead engage with local forms of production and knowledge, taking into account community knowledge and opinion in meaningful ways, to further identify culture with community value rather than top down financialised agendas.

An important issue touched upon in the non-policy box highlights the intensification of land and the difficulties of maintaining it for cultural spaces (HC5 7.5.3). We believe this potentially negative impact of intensification processes needs more attention and scrutiny and should be in the policy box.

Changes (to be added to the policy and text)

London's cultural offer is also informed by a historical legacy of Britain's diverse communities, their lifestyles, culture and faiths, including, importantly, their food culture. This also includes venues in which London's diverse communities celebrate their cultural calendars, births, weddings and deaths and hold community meetings to foster social cohesion, integration and well-being.

Essential spaces for cultural production also include community centres, restaurants, cafes, meeting spaces, theatres, as well as pubs, clubs and music venues.

All requirements must be in consultation with relevant community organisations.

The lack of community spaces in which to plan and organise many outdoor 'free' events might mean they disappear entirely or are poorly planned and resourced. For this reason Councils must support community spaces.

Cultural Quarters are also important in supporting the coherence, integration and survival of diverse communities and the creation of Lifetime Neighbourhoods. We refer to the campaign for a Latin Quarter at the Elephant and Castle.

Boroughs, in collaboration with the relevant community organisations should identify Cultural Quarters and other strategic clusters of cultural attractions in their Local Plans. The food culture of these communities is often what they are symbolised by and as such attention must be given to supporting this aspect through the creation and maintenance of food hubs and market places.

Policy HC 6 Night time economy

The term *appropriate* is subjective and requires more context and background to be effectively used. We must question exactly what type of space is and will be considered appropriate for the night time economy, particularly where the night time economy is being expanded to new and potentially residential areas

The policy excessively stresses improving the economy and attracting visitors, but it is necessary to consider how the quality and convenience of life can be improved in the context of supporting the night-time economy .

The growing emphasis on the night-time economy may reduce the amount of community space that is used to deliver social value and the policy should include safeguards to prevent this happening.

Change

7. Protect, support and promote family-friendly cultural venues that are open all day and weekend, including those that apply to minority communities, such

as temples, mosques and other places of worship, community centres and food outlets that sell healthy ethnic food offerings and support local food hubs.

Policy HC 7 Protecting public houses

We welcome this protection of pubs, but for the policy to be sound it must be extended to a wide range of community assets, such as libraries, community centres, youth centres, music venues, open spaces and public spaces, land for community food growing and street markets. Many community spaces across London have been lost in recent years and others are under threat of closure through a combination of austerity, privatisation and development pressure.

The policy refers to heritage, economic, social or cultural value as the reason for protection. There needs to be more work done on understanding how to effectively measure the social value of pubs. Otherwise economic value may be the dominant criteria and push out wider policy objectives.

Ownership of these community assets needs to be addressed, so that community owned pubs (for example, Ivy House in Nunhead) are valued alongside large pub conglomerates. There is also the need for greater clarity and transparency in regard to the process by which pubs are awarded the status of 'Assets of Community Value' (ACV). The plan mentions ACVs but not in much detail and should provide a link to guidance that will equip communities with the legal and practical knowledge required to achieve such protection. There should be Mayoral funding to support community bids for the ownership of these assets, in the same way as the Mayor is supporting community led housing.

Changes

The policy and text need to refer to community spaces throughout.

Where there is reference to the needs of particular groups (7.7.2) this should include London's diverse ethnic communities.

Chapter 8 Green Infrastructure & Natural Environment

Overview

During the recent TCPA Seminar on the Mayor's Vision on the Natural environment and Healthy Communities (14 November 2017), participants observed that on the environment there is a general lack of will and action by the Government, lack of resources among boroughs and at best weak attention to environmental policies either in practice or in Local Plans. This vacuum makes it all the more important that the Mayor should seize the initiative by setting forward a Plan that embodies determination, a definite course of action, maximising the powers and resources that are available to the Mayor and the GLA. For example, a precept could be levied to support the necessary quality and quantity of green infrastructure required for present and future London.

In addition to this state of affairs should be added the understanding that best practical means and other important environmental principles are handed down from the Treaty of Lisbon (and not from EU Regulations) and will not necessarily be transposed automatically into UK law. This would make it all the more important that the Plan and associated strategies are instrumental and directional on the protection and enhancement of the environment.

The Mayor has statutory powers under section 30 of the Greater London Authority Act 1999 (as amended), acting on behalf of the Authority, to do anything he considers will promote the improvement of the environment in Greater London; and he is reminded of this in the Mayoral Decisions documents (in the "Legal Comments" section) that he signs. Just Space urges the Mayor to make the most of his powers, capabilities and abilities to fulfil the promises and commitments made in his manifesto and the 'direction of travel', A City for All Londoners, to make "the city healthy, resilient and fair, and making it resource efficient, low carbon and green".

Accordingly, the protective and enhancement policies, in the light of current and future development /growth pressures, including those promoted by this Plan, need to be strengthened by substituting 'must' for 'should'. The quality and quantity of the many different kinds of green and open spaces, including blue features, should be accorded value in terms of recognition, protection and enhancement.

Making London a Blue Green City

Given the interactions between different aspects of the environment, an integrated and holistic approach is needed to tackle the existing and predicted economic and population growth of London. The internationally agreed principle of sustainable development stresses that we "achieve our goals of living within environmental limits and a just society, and we will do it by means of sustainable economy, good governance, and sound science". Yet, we are

not “living within environmental limits”. London is not on track to meet even existing targets to control climate-changing emissions and is blighted by illegal levels of air pollution. Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development; or that the food we consume can be healthy, affordable and sustainable.

We have seen serious exploitation of London’s waterways, overshadowed by proliferating lines of buildings, and the absence of sustainable solutions for London’s water-related environmental problems.

The Mayor should make London a **Blue Green City***, by placing value on the connection and interaction between London’s blue and green assets. The Boroughs, the voluntary and community sector and the private sector, including water companies, should be brought together to build public awareness of the importance of environmental targets such as on climate change, air pollution, protecting nature and sustainable use of water resources and provide for community involvement in the formulation and implementation of policies and programmes to ensure environmental targets are actually achieved by the dates required.

This Chapter should be retitled to **Blue Green City** and the policies adjusted to reflect this approach. This includes reinstating the current London Plan’s Blue Ribbon Network.

*The Blue Green City is common in cities of the USA. Newcastle has been selected as a demonstration city in the UK by the Blue Green Cities Research Team.

Blue Ribbon Network

Presently: London’s Blue Ribbon Network is the Thames with its tributaries, the canal network and open water spaces such as docks, reservoirs, marshes and lakes. It is an important resource for London — for transport and commerce, leisure and recreation, as well as biodiversity and as a principal component of London’s public realm. Note that the current London Plan provides for the Blue Ribbon Network (BRN) with policies that reflect its strategic importance and ensures its future protection and enhancement.

What Needs to be Done:

Reinstate the BRN policies and designate the BRN as ‘open space’ giving the waterways the status, as well as protection, of a park. River restoration is a potentially significant improvement that can have a multiple of benefits, such as amenity or flood risk reduction. Because rivers are often shared by local boroughs, the Mayor is best placed to orchestrate and resource a unified approach to their restoration.

Promoting the functional uses by passenger, ferry and freight transport and protecting it from encroachment will help sustain the BRN for recreation and

amenity. Development in the vicinity of the waterside should establish and reflect a relationship with the waterways.

G1 Green Infrastructure, G4 Local Green and Open Space, G5 Urban Greening

Green Infrastructure, within **Policy G1** and in Annex 3 Glossary, is the network of green and open spaces and green features that should be protected and planned as integrated features. This does not reference the blue element of the natural environment, a lamentable omission. Therefore, this framing policy should be rewritten to incorporate the comprehensive approach embodied in Blue Green, including reinstating the Blue Ribbon Network approach.

Make more explicit the approach for a city and people that are intrinsically connected with nature and the outdoors through coordinating, supporting and facilitating grass roots involvement to make London a greener, healthier and fairer place to live, work and enjoy. This approach is embodied within the campaign to declare London as a National Park City. While this response does not give a view on this campaigned for designation, the proposed community involvement is endorsed and should inform this Chapter.

Green Space and Infrastructure

Presently: Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development; or that the food we consume can be healthy, affordable and sustainable. (See also response made to Policy G8).

What Needs to be Done:

Implement policies, proposals and minimum standards which will effectively protect and enhance the amenity, recreational and nature value of green and open space and remedy deficiencies in quantity, quality and accessibility, recognising their importance for nature, health and well-being and for amenity etc.:

Green space categorised as brownfield land (including communal green space on housing estates) needs to be protected, especially where there is a deficiency of green space. These should be designated in Local Plans and registered as assets of community value.

Proactively remedying the areas of deficiency; green space intersects with water, food growing, biodiversity and makes a contribution to reducing air pollution. Deficiencies in all functions of green space must be addressed.

An implementation strategy to ensure every Londoner lives within 400 metres (10 minutes walk) of Local Parks, Open Spaces and Pocket Parks, as described in **Table 8.1** - Public open space categorisation. This is particularly important in areas of deficiency and areas of high density living.

To counter the trend of passing public land to private ownership for public use, any Mayoral policy or proposal needs to refer to publically owned as well as publically accessible space.

Recognise that green space also includes common land (commons) held in trust for future generations.

Ensure sufficient resources for the maintenance of green spaces; encourage and support friends of parks groups that provide stewardship, not only of parks but a range of community facilities and infrastructure.

G6 Biodiversity and Access to Nature

Presently: Habitats and species – areas, numbers and populations are declining as revealed by the State of Nature Report 2016 (<https://www.rspb.org.uk/our-work/stateofnature2016/>) wherein the UK is among the most nature-depleted nations in the world. The Mayor should make greater efforts to remedy deficiencies in access to nature and green and open spaces, nature decline and funding shortfalls. A useful framing for a revised Blue Green Chapter are the aspirations underpinning the Government's 25 Year Environment Plan (<https://www.gov.uk/government/publications/25-year-environment-plan>): the goals for improving the environment and access to it, within a generation, and leaving it in a better state than found. Whilst the follow through on measures and proposals is weak, this can be remedied by a more purposeful Plan.

What Needs to be Done:

Counter any decline in species and habitat, with strengthened policies that improve designated habitat areas; enhance, increase and create new habitats; and make adaptations to the built environment so that everyone has access to nature. To achieve this, the Mayor will review his Biodiversity Strategy 2005 which is out of date and requires:

A joined up approach to green corridors, so that they are also routes for nature.

Protection of the habitat that nature relies on (e.g. hedges, woods and wild meadows) and increase pollinator-friendly planting and bee-keeping. Biodiversity-offsetting schemes should not be supported as nature does not work on a like for like basis. Any such proposal as a matter of last resort must at least require more than is lost to achieve a net gain in biodiversity.

New build and existing buildings requiring change of use should have green / brown roofs for wildlife, water retention and insulation.

TfL land should be used for habitat, as previously with the Capital Bee Line.

Both protect and plant trees as an essential part of re-greening the city. They provide multiple benefits, such as drainage, capturing air pollutants and cooling and shading.

G7 Trees and Woodlands

Protecting, especially veteran/ancient trees, hedgerows and woodlands, and promoting additional planting are supported. But, their loss should be resisted as new planting in the place of existing is often an inadequate substitute.

G8 Food Growing

Presently: This topic is not fully developed in Policy G8 commensurate with its potential for purposeful and rewarding contributions to a better environment, society and London. The proposals in Just Space's "[Towards a Community-Led plan for London – Policy directions and proposals](#)" have reached a very detailed level. See Community Food Growing and Food Production.

What Needs to be Done:

The creation and sustaining of a just food system that allows everyone access to good food and food growing spaces. It is also about granting growers long tenure-ships, not just meanwhile spaces. Food is inter-connected with London's other needs, for instance the need for housing. The proposal is to have food growing space in all new housing developments. There is also an economic need to train people for new jobs and shorten the food mileage and food chain.

At the Strategic Level

Land will be made available and protected to support community food growing and food production enterprises in order to meet the longer term goal of achieving a resilient food system and providing fresh, nutritious food for Londoners. This will contribute to enterprise, job-creation, training schemes, and London's efforts to address climate change.

There will be an increasing amount of sustainable and locally produced food consumed in and around London, through development of strategic partnerships between land owners, and urban, peri-urban and rural food growing projects. 1 [see references at foot of this section]

Food growing and production and distribution are closely related to housing, health, the economy and the environment. It is essential to adopt an approach that is intersectional, participatory and inclusive for consumers, producers and distributors. Food production provides employment and training and contributes to sustainable economic development.

The amount of land in use for growing food will be increased in all urban communities in both inner and outer London, via:

- Integration of food growing space as a requirement in all new housing developments with utilisation of green roof methods and potential for training and enterprise opportunities.

- Partnership between the GLA, Sustain, Local Authorities and established food production enterprises to identify food production sites on GLA and local authority-owned land for new entrants in the sector. This will use best practice models between local authorities and food growing enterprises.
- Career-long agricultural tenure-ships offered by local authorities and GLA for food production sites, to provide sufficient time to develop financial viability, benefits of biodiversity and community development, and soil replenishment through organic food production.

Local Authorities to foster a new generation of London food producers to work in a globally innovative urban food system by funding and supporting:

- Accredited training in organic food production.
- Paid work placements — apprenticeships and shorter-term placements (e.g. 6 months) that support (young) people to further develop skills in the work environment and provide sustainable employment opportunities.
- Associated “next steps” training — e.g. enterprise training, community development training.

The Mayor will promote and enhance the London Food Strategy. This will be implemented through the London Food Board, which will include representatives from London’s community food growing and sustainable food production sector.

At the Local Level

GLA and borough councils to integrate food production into strategic assessments, funding streams and new developments in recognition of the various benefits of the sector and positive land use activity including; access to green space, mental health, enterprise generation, training, personal development, community well-being, access to fresh and healthy food, reduction of carbon footprint in food industry.

Local Authorities must identify and safeguard land and Infrastructure for commercial food production and community gardening, including allotments, parks, orchards, schools and large commercial small scale glass houses. Local Authorities to make accessible a public register of available land e.g. park land, housing estates, brownfield sites or temporarily available sites and to administer a list of interested parties looking for land for production and marketing of food for London. 2

Food growing and food production should be considered as a priority use for public land that is underused or vacant, particularly where not suitable for housing, on a long term basis under the Community Right to Reclaim Land, (Localism Act 2011), or where not possible then temporarily (as a meanwhile use).

Food production enterprises and community gardens to partner Councils in local forums to implement the ‘London Food Strategy’ (2006), ‘Cultivating the Capital’ (2010) and the ‘Milan Urban Food Policy Pact’ (2015). 3

Agriculture land uses should be prioritised in Urban Fringe & Green Belt areas. 4. Boroughs in the urban fringe of London to provide land for development of farm enterprises and farm-to-table housing communities. 5

Local Authorities will support food producers by investment through Section 106 and the Community Infrastructure Levy, specifically to support food growing activities to take place on lands held or acquired by private bodies for 'development'. Examples include the establishment of mini-allotments in housing estates, Community Asset Transfer, and rent reduction for initial set period.

GLA and Local Authorities to independently purchase at least 15% of their total supply of foodstuffs from small-scale, nonchemical producers located in and around London by 2020, 25% by 2030 and 30% by 2036 — to increase demand for short supply chain and build sustainable local economies.

All This Requires:

Development that increases or enhances land for food production for community use will be supported. Consideration should be given to growing space that will be suitable for communities' needs, water requirements, greywater recycling for irrigation, considering sunlight and access needs. Growing space could be part of the soft landscaping strategy or part of the green space provision, or use more innovative solutions such as roof gardens.

Support should be provided to planning applications related to food growing for vital infrastructure such as large scale glass houses, cold stores, containers, packing areas. Moreover planning should consider local distribution of produce, providing suitable office space and creating local distribution hubs. Local authority planning should draw upon the knowledge of successful food growing enterprises and be part of wider strategically zoned planning that includes Urban, Peri-urban and Rural food growing sites working together to provide food for the city.

Notes and References:

1. Urban, peri-urban and rural food growing are characterised by the areas in the city, between the city and the countryside, and the countryside, respectively.
2. The city of Almere (Netherlands) is an example that demonstrates how urban agriculture can become a driver for regeneration. The Dutch University in Wageningen designed a virtual rural-urban city district called "Agromere". In this virtual district, agriculture and urban living merge with each other taking into account the need of all parties involved. This project inspired the city of Almere to implement urban agriculture in its development plans. The draft structural vision "Almere 2.0" allocates land for 15000 new homes with urban agriculture as a main element of the green infrastructure.

3. “Since food policies are closely related to many other challenges and policies, such as poverty, health and social protection, hygiene and sanitation, land use planning, transport, energy, education, and disaster preparedness, it is essential to adopt an approach that is comprehensive, interdisciplinary and inter-institutional”. Taken from the Milan Urban Food Policy Pact (2015) which was signed up to by the Mayor in 2015 and its points are to be incorporated into the enhanced London Food Strategy.
4. Around 15 per cent of the capital’s total area is agricultural land mostly in the Green Belt — less than 10% is actively farmed. (*Cultivating the Capital, food growing and the planning system in London*. January 2010 London Assembly)
5. Agriculture is one of the few land uses permitted in the Green Belt through National Planning Policy Framework (para 89) but it is often given a lower priority. See p31 and Appendix 6 — *Cultivating the Capital: food growing and the planning system in London* 2010, London Assembly.

Chapter 9 Sustainable Infrastructure

SI1 Improving air quality

An important driver of this Plan should be to meet air quality targets. The greater emphasis on cleaner streets is supported, but one that satisfies the Supreme Court's judgement that this should be as soon as possible. This requires greater regulation and restriction of vehicular traffic not only in Central London, but elsewhere. A London-wide Ultra Low Emission Zone (ULEZ) out to the M25 /GLA boundary should be a priority. Targets should be based on the more stretching and public health benefitting WHO limits. Among other measures, this will require the phasing out and ultimate banning of all diesel (including buses and water transport) in a sooner time frame.. Going along with this policy should be strong road traffic reduction targets, fewer and cleaner vehicles, and implementing London wide road user charging (see response to Policy T1). Through planning, traffic generating transport and development schemes should be actively avoided. The need to travel can be reduced by planning mechanisms that support local employment and services.

Presently: There is close alignment with the Mayor on the issues around air pollution. Nearly 10,000 Londoners die early every year due to air pollution (including from fine particles and the toxic gas Nitrogen Dioxide or NO₂ making it the biggest environmental cause of premature death). The capital suffers under illegal levels of NO₂ — EU legal limits set to protect health should have been met in 2010, or 2015 at the very latest. Limits now have to be met in the shortest possible time, following the UK Supreme Court ruling, and all possible measures must now be taken so that our air is cleaned up much sooner. Road traffic is the biggest problem.

What Needs To Be Done:

New schools, hospitals or care homes should not be built in air pollution hotspots and schools near busy roads should be fitted with effective air filtration systems — as recommended by the House of Commons Environmental Audit Committee.

All of London must be made to meet EU legal limits for NO₂ by 2020 at the latest — this is the date the rest of the UK will have to comply by, and Londoners should not have to suffer dangerous levels of air pollution for a further 5 years after the rest of the country.

London must set itself on a path to meet the World Health Organisation recommended level for PM10 air pollutants. New limits for finer particles PM2.5 will be needed. Tackle construction machinery and river/canal boats that emit high levels of pollutants.

Reduce the need for people to have to travel, promote and designate by way routes that have lower levels of pollution for walkers and cyclists, cut road traffic levels and ensure road vehicles are clean (which should mean phasing

out diesel altogether), and this means a joined up approach to improving the environment, transport and infrastructure with:

- strong road traffic reduction targets and avoiding traffic generating transport schemes;
- fewer vehicles and cleaner vehicles;
- implementing London wide road user charging; and
- strengthening Low Emission requirements to include cars.

Meeting air quality targets requires greater regulation and restriction of vehicular traffic in Central London and elsewhere with the phasing out and ultimate banning of all diesel (including buses and water transport) and a London-wide Ultra Low Emission Zone (ULEZ). It should be remembered that manufacturers' compliance with Euro standards is held in disrepute. But climate change remains an issue even if the air quality crisis was solved. The Road Map to Zero Emission Road Transport should be amended accordingly and should be delivered through an Implementation Action Strategy setting out the measures that are determined to be necessary to fulfill this objective.

Road Traffic Reduction Target Setting would guide policy and proposals by providing benchmarks to measure progress, determine the need to strengthen or further resource implementation and require other agencies and authorities to fulfill their responsibilities in delivering an integrated transport strategy. Road user charging, London wide, would change travel behaviour and tackle congestion and pollution. (It is still in the current London Plan 2015—para 6.39A). This would create a fairer share of space for cyclists and buses, with revenue used to support sufficient, reliable, safe, affordable and accessible public transport. However, it would need to be applied in a fair and proportionate way and could operate in a variety of ways, such as higher charges during peak periods or for certain vehicle types etc. (See response to Policy T1).

Supporting guidance for the implementation of Air Quality Neutral should be made more intelligible, that is more understandable and accessible, in order that its application is more readily undertaken by the boroughs and open to scrutiny by non-technicians and communities. Presently, guidance on Air Quality offered by the London Councils organisation allows developments to predict their emissions at 105% of a site's original emissions and still be classed as AQ Neutral. Air Quality Positive has yet to be supported by published guidance.

Specifically for this **Policy, SI1A** should read: “London’s air quality must be significantly improved...” in order to reflect the imperative of the Supreme Court’s judgement on the current illegal levels of air pollution.

SI2 Minimising greenhouse gases

Climate change remains an issue even if the air quality crisis is solved. An implementation strategy setting out the measures that are eventually determined to be necessary to fulfill the policies and proposals is essential.

The route map to achieve London as a zero carbon city by 2050 has yet to be determined. Even the current London Plan 2016 is unclear as to the mechanisms that will result in compliance with the prescribed carbon reduction targets towards the latter part of its plan period.

Presently: Greenhouse Gases (GHGs) may have been falling, but not enough to keep on track to meet climate change targets.

What Needs to be Done:

The Mayor must strengthen the Climate Change targets after the Paris agreement December 2015 and the aspiration for 1.5 degree limit to the global average temperature rise. This requires changes to energy generation, energy efficiency, and targets for renewable energy in order to achieve:

At least 80% cut in emissions by 2030 to have a strong chance to keep within the 2 degrees limit to global temperature rise based on 1990 levels.

Zero carbon new homes standard to be kept in London.

Solar panels on all new buildings and existing and new school buildings.

Increase decentralized renewables ten-fold by 2025.

100% renewables and 100% zero carbon by 2050.

The Mayor and his family of functional bodies should use their property portfolio for extensive renewable energy production and local distribution.

Embodied Carbon:

The role of reducing whole life building emissions (embodied carbon) as explored by this Policy is a start. The Plan should have greater referencing to 'embodied carbon', with an aim of increasing efficiency in/ minimising resource use, and as a 'tool' to measure the need to and effectiveness of carbon reduction programmes across large areas and sectors. There is an imperative to go beyond current policy concepts and targets in order to deliver the exemplary development that is needed for a London under resource and environmental pressures. It is appropriate to think, for example, beyond zero carbon buildings and plan for buildings that are carbon sinks. Again, although particularly challenging, would be an implementation plan for the reorganising of London's activities and developments to minimise embodied carbon that would truly realise a zero carbon London. But see under the response to 'Low Carbon Circular Economy' the Just Space proposal for a '**Green and Localised Economy**' and our response to §3.1.11. in Chapter 3 above.

Policy SI2C should be rewritten to clarify that "a minimum on-site reduction of at least 35%..., 10% ... and 15% through energy efficiency measures" is an interim step on the way to meeting the zero-carbon target and timeline milestones should be provided. This is to ensure the ambition of this Policy is met in a timely and measurable way. A post-occupancy evaluation requirement should be added to Policy SI2 to ensure that development is performing in accordance with specifications.

SI3 Energy infrastructure

Presently: Significant levels of fuel poverty and inefficient energy use, coupled with fossil fuel based supplies and suppliers distant from consumers. There are many winter deaths, especially in hard winters.

What Needs to be Done:

A shift is needed in London's energy infrastructure, to meet carbon emission targets, move away from fossil fuels and nuclear dependence and tackle fuel poverty, by:

The creation of an ambitious new fully licensed not-for-profit publicly owned energy supply- company owned by London public bodies that is dedicated to cheaper, cleaner and more democratic energy. (See <http://switchedonlondon.org.uk/>). One that is more interventionist and can take meaningful action on fuel poverty, democratically run by and in the interests of Londoners.

A major retrofitting programme for existing homes, with those in fuel poverty having their homes insulated first, and

The introduction of London-wide minimum energy efficiency standards in private rented homes, of Energy Performance Certificate C, by 2025.

All efforts should be made for pension fund divestment from fossil fuels and reinvestment in renewables. The GLA should implement full and immediate divestment from all fossil fuel companies.

Future proofing by recognising that the supply of energy for cooling, and the supply of cooling itself, will become increasingly important over time. Similarly, the supply of energy for electric vehicles will change the dynamics of energy generation and consumption. There are increasing prospects of vehicle batteries acting as storage for non- continuous renewable energy, for example.

These are further elaborated in the following sections on **Caring for Existing Homes** and on **Quality for New Homes**. **Proposals that follow relate to the sustainability objections of Chapter 9 and the design considerations of Chapter 3.** Fuel poverty is a pressing social issue and should be specifically addressed within Policy.

Caring for Existing Homes

Presently: It is essential to maintain and refurbish existing homes, not knock them down. Given the material loss of social housing, it should be a high priority that existing social rented homes are protected and this requires changes to the current model of estate regeneration. Demolition of homes is among the most contentious issues in urban regeneration. [Just Space](#) and the [London Tenants Federation](#) commissioned the Engineering Exchange and the [UCL Urban Laboratory](#) to review the technical evidence for demolition or refurbishment of social housing in London. The review found that housing refurbishment is often better than demolition and reconstruction, when considering social, environmental and energy factors. The series of resources

includes life cycle evidence review and a Carbon (embodied energy) Fact Sheet: <http://www.engineering.ucl.ac.uk/engineering-exchange/demolition-refurbishment-social-housing/>

Of particular importance are high levels of fuel poverty; the UK has one of the least energy-efficient housing stocks in Western Europe. The solution is for the Mayor to designate home energy efficiency as an infrastructure priority. Retrofitting on a large scale would provide jobs and consequent economic benefit, and reduce energy consumption and environmental degradation.

What Needs to be Done:

The Mayor and the boroughs will support maintenance and enhancement of the condition and quality of London's existing homes to ensure that new homes delivered are additional to existing stock rather than replacements. This will include designating energy efficiency as an infrastructure priority and using infrastructure funds to deliver stable, long term investment to implement a locally-led programme for the upgrade of all existing London homes to B and C on an Energy Performance Certificate.

Boroughs should develop policies and proposals to reduce environmental impact, particularly lifetime and embodied carbon emissions, through the sustainable retrofitting of existing homes. In particular they should:

- Prioritise adaptations to the homes of older residents.
- Prioritise fuel-poor and vulnerable households .
- Identify synergies between new developments and existing homes.
- Through retrofitting of energy and water efficiency measures, decentralised energy and renewable energy options.
- Make the link with public health programmes (for example, a boiler on prescription programme for those most vulnerable).
- Include minimum energy efficiency standards as a condition of licensing in the private rented sector.
- Encourage energy rights initiatives and community based energy projects.

Refurbishment options for existing council or housing association estates should include proposals to retain, enhance or deliver green and garden spaces, play and youth provision and community space and buildings.

Proposed regeneration of council or housing association estates should require comprehensive, independent analysis of social, environmental (including embodied carbon) and economic benefits of all proposed options and a ballot of tenants and leaseholders. Options should always include refurbishment.

Quality of New Homes

Presently: New homes are not being delivered with full consideration of longevity and durability of construction (c.f. embodied energy). The health of

residents should guide design, avoiding the negative impact of dark homes and outside spaces and providing sufficient communal areas. The GLA has permitted developments far above levels agreed in the density matrix, yet there has been no analysis of the effects on health and wellbeing of people living in them or affected by them. Attempts to reduce standards of sun and day-lighting for development will have knock-on effects on energy consumption and amenity spaces that need to be carefully analysed.

The emphasis placed on access to public transport within the density matrix brings with it the danger that we lose sight of the higher goal whereby people can satisfy their daily needs of work, shopping and recreation within walking distance and only have to rely on mechanised transport for more occasional needs — the ‘walkable city’ concept which, among other things, is more energy efficient.

Density levels can be optimised to help achieve the zero carbon city, but they should be sensitive to the needs of all communities, and all communities, including all household sizes and incomes, must have the facility to live in all parts of London.

What Needs to be Done:

New homes should be built to last a minimum of 125 years. The design and construction should ensure adaptability so that retrofitting and rearrangement of internal spaces can occur.

New homes should be energy positive.

Communal meeting spaces and green and play space with good natural light should be integral to the design of new housing blocks and estates.

A new more sophisticated density matrix that combines housing, social and community infrastructure should be developed. This will take into account household income, financial accessibility to transport, proximity of accessible (both in a physical and financial sense) sport and leisure, community, youth and safe play facilities, levels of overcrowding and preservation of local character.

SI4 Managing heat risk

Extreme heat wave summers that are presently an occasional event, are predicted to become the norm in the not too distant future. Managing heat risk and securing cooling networks are necessary measures.

SI5 Water infrastructure, SI12 Flood risk management, SI13 Sustainable drainage

Presently: London is both a water-scarce area and an area which is subject to flooding. Extensive and continuing land cover by water-impermeable materials stresses existing drainage; this has been compounded by changes in rainfall, higher volumes falling in shorter time. Flooding in London has become a more regular occurrence. This leads to overflowing in the combined drainage system where high flows of surface drainage mixes with sewage

flows and to consequent sewage discharge in to the River Thames. The construction of the Tideway Tunnel is recognised as a partial solution.

Covering of permeable surfaces and intensification of rainfall have contributed to the growing flooding problem. Densification of London's housing, by eroding existing open space, including brownfield space, is also contributing to the future problem of water scarcity. Again, rainfall intensification, short, intense showers, leads to run-off rather than retention. London lies in a water scarce area with similar rainfall volumes to parts of North Africa. Rainfall, here, is half of that falling in the driest areas of Wales.

What Needs to be Done:

The '**Blue Green City**' (see below) will ensure that water management plans provide the maximum green infrastructure benefits and that green infrastructure contributes to flood risk management. Key elements will include:

- Sustainable urban drainage systems
- Stopping the leaks
- Increase in river and canal transport for passengers and freight, including waste and construction materials

An important tool for achieving this cross-cutting policy approach is Integrated Water Resources Management which understands that water resources are an integral component of the ecosystem, a natural resource, and a social and economic good. These should be rolled out beyond Opportunity Areas to manage risk and promote good planning of environmental assets (9.5.12).

Incremental, low impact small scale interventions should be promoted.

Specifically for **Policy SI5C3**, it should be noted that the Health Inequalities Strategy's Integrated Impact Assessment flagged up water poverty as an issue for large poor families that have or are likely to receive smart metering. Water consumption minimisation through this measure needs to address this issue.

Making London a Blue Green City

Given the interactions between different aspects of the environment, an integrated and holistic approach is needed to tackle the existing and predicted economic and population growth of London. The internationally agreed principle of sustainable development stresses that we "achieve our goals of living within environmental limits and a just society, and we will do it by means of sustainable economy, good governance, and sound science". Yet, we are not "living within environmental limits". London is not on track to meet even existing targets to control climate-changing emissions and is blighted by illegal levels of air pollution. Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development; or that the food we consume can be healthy, affordable and sustainable.

We have seen serious exploitation of London's waterways, overshadowed by proliferating lines of buildings, and the absence of sustainable solutions for London's water-related environmental problems.

The Mayor should make London a **Blue Green City***, by placing value on the connection and interaction between London's blue and green assets. The Boroughs, the voluntary and community sector and the private sector, including water companies, should be brought together to: build public awareness of the importance of environmental targets such as on climate change, air pollution, protecting nature and sustainable use of water resources; and provide for community involvement in the formulation and implementation of policies and programmes to ensure environmental targets are actually achieved by the dates required.

Sustainable Urban Drainage System (SuDS)

Presently: There are many proven methods of ameliorating surface flooding: street tree planting to soak up rainwater, green roofs and walls, permeable pavement and road surfacing, green spaces that rainwater can sink into — rain gardens, swales to channel run-off and so on. Similarly, grey water could be harvested on large roof areas and technology for harvesting, filtering and purification exists. Ideally this could be utilized in nearby housing, for toilet flushing, garden watering, car cleaning etc. Yet, these techniques are rarely used.

What Needs to be Done:

The Mayor should produce SuDS Guidance on practical measures and provide a knowledge bank for developers and planners, alongside programmes to achieve community involvement in their implementation and maintenance.

The Mayor needs to make the case for sustainable drainage and rainwater harvesting to be mandatory for water companies and new development, and will explore retrofitting for existing development.

SI6 Digital connectivity infrastructure

This is particularly important for future-proofing not just for London's "global competitiveness", but for the supporting of everyday modern life. Remember for some people there can be electromagnetic adverse effects phenomena.

SI7 Reducing waste and supporting the circular economy, SI8 Waste capacity and net waste self-sufficiency, SI9 Safeguarded waste sites

Presently: Only about half of London's waste is recycled and land fill options are closing. Litter abounds.

What Needs to be Done:

Consistency in municipal waste collections is to be welcomed, but people still need to change their attitudes and recycle more. There is a role here for peer

to peer encouragement of behaviour change through empowered and supported community groups. Similar efforts could be applied to food waste reduction. The provision of incentives (e.g. reduced fees or Council Tax) as well as persuasion should be considered. Integrating the means to dispose waste effectively and properly, with a focus on recycling design of products and packaging is crucial. This is especially important for flats and businesses. Business waste needs to adopt high levels of recycling.

Waste from everyday living, as exemplified by non-recyclable coffee cups or plastic bottles, has now joined the concerns about waste for community and environmental groups. These now look to Scotland's zero waste and plastic bottle sur-charging for inspiration. The Mayor should do likewise.

There is a tension between the benefit of increasing recycling rates and the effort that requires. Again, there is a tension between maximising recycling rates and achieving a circular economy wherein products and materials are reused again and again. The Mayor should clarify how these tensions can be overcome.

Concerns have been expressed over the seemingly unregulated nature of construction waste reuse and that no monitoring is undertaken over the disposal of hazardous materials such as asbestos. SME builders and home improvers do not seem to have easy access to appropriate construction waste management facilities.

Food 'waste' is a resource to be returned to the natural cycle of the environment in an environmentally friendly way. Food 'waste' could be reduced by facilitating Londoners to grow their own food, for food that is the product of one's own labours that can be harvested as and when required and is less likely to go to waste if there are sharing and distributive mechanisms in place.

Policies SI7A4 and SI8D3: A moratorium on new incinerators is needed. Waste management companies are still interested in pursuing such 'energy from waste' plants on the grounds that they contribute to sustainability. Underpinning their justification for energy from waste is a fundamental misunderstanding of resource use and the Circular Economy concept. A circular economy is one that minimises the use of materials and minimises waste by using and re-using materials efficiently. (See London Assembly Environment Committee Growing, Growing, Gone Report, March 2016). Energy from waste is next only to landfill at the lower, least sustainable, end of the waste hierarchy (Waste Management Plan for England). The Plan should make it clear that waste is to be driven up the waste management hierarchy. See our comments on §2.1.11 above.

The Circular Economy

Presently: A wider understanding of the circular economy needs to be further developed and integrated into policy and practice. It is presently

pitched and defined (9.7.1) as an economic model, but whilst this may offer attractions to businesses and those promoting economic growth, this is not its full potential. West London businesses were introduced to the concept by the Mayoral Development Corporation the OPDC, liked it, but did not understand how it can be introduced and brought up to scale. Transition will not happen unless the practicalities are understood and easy entry points to change are available.

What Needs to be Done:

The route map to a more sharing, lower carbon intensity lifestyle and economy is available to London through a '**Green and Localised Economy**'.

A Green and Localised Economy

To ensure that economic development works within environmental limits the Mayor needs to mainstream the principles of a green, circular and localised economy which would ensure better use of resources and a more dispersed pattern of activities, building on London's thriving local economies.

It will be essential to ensure that all enterprises in London have the means to become greener and to take part in a circular economy, minimising their waste and energy consumption and promoting reusing, repairing and recycling. Energy production at the ultra-local level could be an integral part of a more secure and resilient energy system and instrumental in developing sustainable local economies more generally.

The role of the public sector will be extremely important in driving innovation, research and development. The GLA and London's public institutions should plan for and invest in the future of activities with low environmental impact, especially aiming to increase the productivity of low wage sectors.

Car travel, long commutes and long-distance deliveries can be reduced by ensuring employment and amenities are available and accessible across London's neighbourhoods and that businesses are inter-connected. A more localised economy will move away from the current over-reliance on the Central Activities Zone and the town centre hierarchy, towards a more poly-centric distribution of local centres that often include high streets, shopping parades and street markets. These provide local jobs, low cost workspace and a variety of products and services, as well as essential social infrastructure.

More than two thirds of London's jobs are located outside the Central Activities Zone (CAZ) and London's 600 high streets represent some of the most important spaces in the city for the local economy; they have proved to be resilient over the centuries, adapting as circumstances change. Trading in street markets and covered markets, the oldest form of retail trading is increasingly under threat. Many of our markets are especially valuable to low-income communities and the low cost of pitches and stalls support entrepreneurship and family businesses. A rich mix of economic activity

contributes to increased wellbeing, security and support especially for those who are most disadvantaged. Local jobs are particularly important for those with child-care or other caring responsibilities especially when part-time work is scarce.

However, the historic diffusion of business spaces across London in most neighbourhoods and districts is disappearing due to the scale, density and nature of residential and current forms of “mixed-use” development. The pressure on local authorities to sell off public assets including libraries, markets, community centres and leisure centres has accelerated the loss of social infrastructure, employment and affordable workspace of all types.

All This Requires:

Encourage changes in consumption and production to achieve a sharing and circular economy, setting targets to reduce all types of waste, supporting reuse, repairing and recycling activities (for example through networks connecting surplus food, building materials, furniture, IT equipment etc. with people in need). Ensure support and funding schemes are easily accessible to SMEs, social enterprises and local community groups for education and training programmes (for example, waste management, resource-efficiency, accessing local supply chains).

Raise the environmental performance of the building stock and reliance on non-renewable energy sources (see response above to Policies SI 2 & 3 Greenhouse Gases and Energy) and re-configure settlement and urban patterns to reduce the need for travel.

Protect London’s poly-centric economy by supporting development which does not compromise the economy and diversity of local high streets, town centres of all scales, local shopping parades, markets and shopping centres, particularly outside the Central Activities Zone.

Support development which fosters Lifetime Neighbourhood principles (see Implementation section of Just Space’s [Towards a Community-Led plan for London – Policy directions and proposals](#)), with a focus on creating well-paid and secure local jobs and access to local amenities and services affordable to everyone.

Planning applications for major new development will take into account the need for new workspace to accommodate a mix of economic activities in all sectors, including community and voluntary organisations, social enterprises, education, play, religious, health and care facilities.

Recognise and protect street and covered markets as a) a source of healthy and cheap food and other goods b) a social benefit c) a source of independent business and local supply d) providing local employment e) an opportunity for start-up businesses. Local authorities should seek to retain control of

management and rent-setting and must consult with traders and customers on future proposals.

SI10 Aggregates

Ensuring that restoration is completed in a timely way in order to protect the amenities and openness of what are mainly Green Belt/MoL designated excavation areas should be an objective of Policy SI10D.

SI14 Waterways – strategic role, SI15 Water transport, SI16 Waterways – use and enjoyment, SI17 Protecting London’s waterways

Waterways are no longer termed the ‘Blue Ribbon Network’, and are subsumed into such Chapters as 7 Heritage and Culture, 8 Green Infrastructure and 9 Sustainable Infrastructure, with a reduction in policies and text. The Blue Ribbon Network of the current London Plan should be reinstated to reflect the strategic significance of the interweaving and interconnected extent of waterways throughout London. The activities that actually happen on the waterways, and their potentials, should inform policy more.

Policy SI14 should deal with more than the tidal Thames by including the range and diversity of waterways. It should reference the water transport functions, including freight, alongside the more amenity-driven Thames Policy Areas/ Strategies to ensure that all the ingredients of the strategic role are properly identified.

Accompanying policies that promote wharf to wharf shipments and waterborne transport generally are supported. On the waterways there should be (more) multi-stop, fast ferry services, with TfL providing more resources for water transport (existing fare structure and waiting times are a barrier). Crossing the Thames by ferries has more merit than building more bridges, even if they are walking and cycling bridges. Shift road freight to rivers and canals by enhancing water transport opportunities, facilities and services. Operational facilities for water transport, to a degree, have policy protection through the existing London Plan 2016 (see policies 6.2 & 7.26), but satisfactory adherence to these is contested by developers etc.

Monitoring

There is a relatively limited number of targets within the Sustainable Infrastructure Policies and they lack timeline milestone targets and measures. More targets, clearly stated would make possible an effective evaluation, monitoring and managing process. These need to finely attuned and specific to the policies and proposals because Chapter 12 Monitoring Key Performance Indicators and Measures are high-level and distant from the Sustainable Infrastructure Policies.

Reference to the draft London Environmental Strategy (LES) is not particularly helpful as the draft LES IIA (7.2.1.3) promises that a framework will emerge

post adoption of LES. Evaluation and monitoring, consequently, will be problematical without further targets and milestones relevant to the Sustainable Infrastructure Policies of the Plan. Reviewing the progress of the Plan and LES is not only an issue for compliance with the Strategic Environmental Assessment Regulations but one of wider democratic accountability whereby Londoners can participate in the process, enabled by ready and easy access to information. And on this point, Just Space asks that in addition to the (quantitative) indicators, which could usefully include measuring changes in public/business opinion, awareness etc., that there be qualitative assessments undertaken by community and environmental groups. There is an important role for communities in monitoring, safeguarding and enhancing the environment.

Indicators:

Just Space, in its meetings with London Plan planners, included a short presentation on suggested 'Indicators for Monitoring and Implementation' for the new London Plan KPIs, did quote the observation that "monitoring is also undertaken by the London Sustainable Development Commission" (LSDC) (from London Plan IIA Scoping Report para 7.5.4) and that some of the environmental indicators, particularly the more nuanced ones, being adopted by the LSDC, together with its monitoring, would benefit from a higher profile. It is somewhat surprising that no reference to the LSDC and its monitoring can be found.

Just Space's publication "[Towards a Community-Led plan for London – Policy directions and proposals](#)" includes some suggestions for indicators (pp65-66) which are directly relevant for sustainability. These are included here below* for the sake of completeness. But it is recognised that there ought to be further deliberation on the choice of the most suitable indicators. Just Space asks that communities be actively involved in their formulation and operation.

*"C. Environment: Carbon emissions in relation to the minimum limit set to avoid dangerous climate change (using Defra data); similarly for air quality.
I. Sustainability of resource use (for example capacity of renewable energy equipment installed; amount of waste generated that is not recycled).
J. Environmentally-damaging travel and transport generated by economic activity (for example number, distance and cost of work-trips, deliveries, air-travel)."

Chapter 10 Transport

Overview: The relationship of this chapter with the others is a challenge in itself to get right. London's population is predicted to increase considerably, but the current Plan and draft new Plan are not doing enough and will not do enough to reduce the need for people to travel and to maximize uptake of walking and cycling before bringing forward mega transport projects. New roads and river crossings for vehicles, which would add to the problems of traffic congestion and pollution, are being pursued without non-road alternatives being properly considered. Poor attention has been given to social and environmental factors, such as carbon emission targets, air quality, public transport fares and local employment. The Plan and the Mayoral Transport Strategy need binding policies to bring essential changes in our transport habits.

This is not simply a challenge that can be resolved through closer attention to proper policy formulation within this chapter, but requires a substantial change to the visioning of London's future as presently set out in the Plan's Chapter 1 Planning London's Future (Good Growth Policies) and further elaborated elsewhere in the Plan. A substantial change to one that embraces a new geography and imagination for London: one underpinned by inclusive growth, fairness and diversity of people, businesses and places; more balanced and polycentric, with Lifetime Neighbourhoods and Lifetime Suburbs; therefore, avoiding reliance on the Central activities Zone/Isle of Dogs, high-order Town Centres and on a small number of economic sectors. (See our response elsewhere, particularly on Chapter 2 and the Appendix: [Proposal for a Community Generated Spatial Option](#)).

It is standard practice for strategies to translate their visions into objectives and thence to policies and proposals. Just Space in its Towards a Community-Led Plan for London publication set out, among many other ones, transport objectives that this network asks should set the framework for transport planning. To serve as examples, they are attached to the end of this part of the response on Transport as Annex: Transport Objectives. By applying these Objectives, the Policies and Proposals of the Plan would need to change. These changes are discussed policy by policy below.

Monitoring: There is only one numerical and temporal target within the Transport Policies (in T1). For this, milestone measures and targets en route to 2041 should be clearly stated to make possible an effective evaluation, monitoring and managing process. In addition, other targets and milestones need to be set to ensure that the necessary organising of London with the provision of appropriate infrastructure for better walking, cycling and public transport, that is sufficient, accessible, reliable, safe and affordable, are delivered. These need to be finely attuned and specific to the policies and proposals because Chapter 12 Monitoring's Key Performance Indicators and Measures are high-level and distant from the Transport Policies.

Whilst it is noted that TfL's Travel in London annual statistical report will publish trends and outcomes (12.1.5), it is standard practice for the tests of appraisal and evaluation and the indicators to be identified within the 'covers' of a strategy.

So far the draft Mayoral Transport Strategy (MTS), as published for public consultation, "does not include a comprehensive set of monitoring indicators to measure and evaluate progress towards the goals or improvements against the challenges identified in the MTS" (draft MTS 8.5.3). Again, the multi-criteria framework tool to appraise schemes and proposals has yet to be developed (draft MTS 8.5.4). Evaluation and monitoring, consequently, will be problematical without further targets and milestones to the Transport Policies of the Plan.

T1 Strategic Approach to Transport: supports a transition to sustainable transport and sets a target of 80% of trips in London by 2041 to be made by Active Travel (foot, cycle or public transport). Given that the absolute numbers of trips are predicted to increase, this would be a transformational and challenging accomplishment. The task of such modal shift is understated here. Reducing the need to travel does not inform this Policy or Chapter. As with the draft Mayoral Transport Strategy, Road Traffic Reduction Target Setting should be part of policy.

Reduce the need to travel: Planning should start with reducing the need to travel as well as to the promotion of sustainable and active travel. This requires greater attention to facilitating walking and mainstreaming cycling. Cars and HGVs (Heavy Goods Vehicles) are a dominating influence on London whereas car sharing, cycling and walking are liberating. Amenity, the environment and users should not be subordinated to the demands of road traffic, but should be enhanced by appropriate levels of connectivity with the emphasis on the sustainable modes of travel. Reallocation of road space between users would ensure fairer share of space for cyclists, buses, pedestrians and public realm. The aim should be to achieve liveable attractive places and spaces for all parts of London, not simply the iconic destinations, such as Oxford Street, and for all, including, for example, children, the disabled, not just active adults.

Road Traffic Reduction Target Setting should be part of policy. Target setting would provide benchmarks to measure progress, determine the need to strengthen or further resource implementation and require other agencies and authorities to fulfil their responsibilities in delivering an integrated transport strategy.

Road user charging, London wide, would change travel behaviour, may make streets more pleasant places, and tackle congestion and pollution. (It is still in the current London Plan 2015 - para 6.39A). It would need to be applied in an equitable and proportionate way and could operate in a variety of ways, such as higher charges during peak periods or for certain vehicle types etc.

Acceptance may prove problematical over, for example, privacy issues, but the Mayor should commit to developing these schemes rather than simply “considering” as per the draft MTS’s Proposal 19 [draft MTS p83]. With traffic reduction, this would create a fairer share of space for cyclists and buses, and the revenue raised used to support sufficient, reliable, safe, affordable and accessible public transport.

This, together with reducing the need to travel and the adoption of the sustainable travel hierarchy, should underpin the whole of the Plan. This means prioritising improvements for walking and cycling to more local facilities before mega-transport schemes and agglomeration. (For example, see <https://www.imeche.org/policy-and-press/reports/detail/transport-hierarchy>).

Car Sharing: The widespread adoption of sharing could reduce on street parking, improve the street scene and create space for the Healthy Streets Approach. The encouragement and facilitation of this should be made explicit. This would align better with the principles of a Circular and Sharing Economy.

Transport and the Spatial Development Patterns: Transport Chapter (T1 or perhaps T3) should say more on how the Policies will result in a London that is spatially developed in a more sustainable way. Chapter 4’s Policy H1 (B 2a) is the new suggestion in, for “incremental intensification” (4.2.5) which identifies “sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary” (District, major, metropolitan and international town centres) for optimizing housing delivery potential on such sites as small housing sites, brownfield sites, strategic industrial land, surplus public sector and utility sites, low density commercial and retail uses etc. See also Maps 4.2 and 4.3. Densification of development at and around stations has generated and would generate typically speculative, formulaic ‘luxury apartments’ that do not meet local need in terms of affordability, tenure, unit sizes or amenities. It neither creates life time neighbourhoods (current London Plan policy) or sustainable development (national planning policy), but act as agents of change that disrupt and displace settled communities and are likely to lead to increased travel, both quanta and distance. And by occupying scarce sites such developments deprive localities of the opportunities for more carefully curated development attuned to their physical, economic and social fabric.

Outer London needs lifetime suburbs - mixed communities of jobs and homes with everyday facilities & services - to scale up lifetime neighbourhoods going beyond the small planning unit of the neighbourhood – with flourishing town centres. There needs to be a real mixed development strategy for Outer London that the Plan supports. This would reduce the need for travel, the length of travel, and overdependence on the centre of London (Central Activities Zone) by a greater share of economic opportunity, jobs and homes. However, a caution should be stated: that the ‘High Street’, industrial and

transport lands need to be protected to ensure the proper functioning of London including its local/real economy.

There are international examples that may usefully inform the strategy if used with care. Transit Oriented Developments (TODs) are planned integrations of neighbourhood service and employment hubs around rapid transit stations together with higher density development that has low levels of car usage. Tokyo's railway station areas can be seen as good practice. Across a wider scale, Malmö's Comprehensive Plan 2014 plans growth in urban multi-function concentrations around public transport nodes. Existing London Plan policy using the Public Transport Accessibility Level (PTAL) matrix promotes transit adjacent development, namely higher density development, but without the full realization of the sustainable development benefits of TODs.

There is a need to challenge this use of PTAL with new more sensitive assessments that analyse transport connectivity to, for example, employment opportunities, door to door accessibility, factoring in ease of travel etc. However, this must not be at the expense of retaining and creating sustainable communities. Any policy or proposal must be compatible with appropriate policies that prioritise social sustainability - strong and inclusive communities, recognising the value of existing local economies, delivering the homes that Londoners actually need and so forth. See our comments on D6 density.

Delivery: Whilst **T1A** refers to Development Plans (sic) and development proposals, it does not specifically refer to Local Implementation Plans (LIPs). The draft MTS writes relatively little: "Healthy Streets and healthy people, including traffic reduction strategies; good public transport experience; and new home and jobs" are "several policy goals [that] can only be achieved with substantial borough-level intervention" (draft MTS p275). These are quite fundamental ones for both the Plan and the draft MTS, and are all dependent on the willing collaboration of the boroughs in the light of the tenuous funding of the Plan and MTS (funding is assessed elsewhere in our response). The handing down of policies and proposals give limited space for the originating at a local level of proposals that are appropriate for the locality and its particular character and ambitions. To be effective in delivery, the Plan should clearly set out the resourcing and expectations to be placed up on boroughs having first ascertained that they are broadly acceptable and, therefore, realistic.

Future proofing: The new Plan should be more future proofed or future ready by recognising the changing ways of moving, working and living that are increasingly evident, such as on-line purchasing, electric vehicles and working from home/ peripatetically, declining TfL fare box; and are likely to emerge in the not too distant future, as with on-demand technology, artificial intelligence and job replacement, autonomous vehicles and drones. The resulting impacts

on travel behaviours, land uses and the spatial patterns of London should be explored through this 25 year strategy.

It is imperative that Connected and Autonomous (C&A) vehicles adapt to the street environment which is set to improve through the Healthy Streets Approach and that the street environment is not adapted to meet the technical requirements of C&A vehicles.

Professor Helmut Holzapfel (consultant to Mercedes Benz) in “Will future transportation technologies solve our transport problems?” seminar, 18th May 2017, UCL, predicted that vehicle manufacturers would seek to have street environments simplified and other road users more closely regulated or corralled. That C&A vehicles are not only fit for purpose but fit for our streets needs to be emphatically expressed.

T2 Healthy Streets: The Healthy Streets Approach should make more explicit attention to the protection and enhancement of mobility needs and that this should be expressed in policies **T2 and D7 Public Realm**. Unnecessary clutter, uneven surfacing, inadequate provision and so forth impedes walking and the mobility of those with electric buggies/scooters for the disabled or those with pushchairs. The emphasis on cycling , admirable as that may be, leads to a lack of attention on those who are unable to cycle or even to walk further or more frequently because of age, infirmity, disability – temporary or enduring – or because of personal duties such as caring for small children. The roll out of walkable attractive routes, places and spaces for all parts of London that put walking first should have good connectivity with public transport.

Access Upgrade: The present access upgrade programme is lamentable. Accessibility, where provided, stops at the platform edge with a gulf between that and the train. If you cannot use the stairs/steps, then a glance at a step-free tube map reveals that much of central London is inaccessible to you. And the 5 yearly performance of delivering step-free tube stations will decline over time according to draft MTS Figure 17 (p130-131): 2020-24 25; 2025-29 15; 2030-39 15.

Given the size of the Network Rail and Overground networks, Figure 17’s one or two step upgrades per annum is disappointingly slow and will make only marginal improvements to accessibility over time. N.B. It is not clear how many of the step free tube stations that are promised will be upgrades of existing stations and how many will be new stations on the new lines/extensions.

Denial of the ability to independently live and travel worsens the health and well-being of those with access issues. Until all bus stops, all taxi ranks, all rail stations and all tube stations are fully accessible this is not A City for All Londoners. Londoners do not have a prospect of full accessibility even by

2041. To be meaningful, this policy should include an ambitious and challenging time target of achieving full accessibility, say, within 2 terms of the Mayor.

Feeling Safe: on public transport and in the streets is crucial, particularly for the more vulnerable members of society. An important component of a secure environment is the presence of staff, as well as the specialised policing, on public transport. The recent reducing of staffing levels at stations was a retrogressive step. Policing of the streets through the Safer Neighbourhood Teams are important. Since the Mayor's Police and Crime Strategy has already been finalised, this will need to be revisited, to ensure that needs and proposals are aligned, integrated and adequately resourced.

Road Safety: The intentions here (10.2.8) to strive to reduce road danger and improve safety are commendable. But there are issues of safety around pavement cycling and the disregard of traffic regulations, shared surfaces and 'floating bus stops' which are separated from main pavements by cycle lanes. These all present hazards to pedestrians, particularly to the younger, older, disabled, and less agile members of the population. A wider adoption of 20mph speed limits should be part of the transition to Vision Zero whose implementation mechanisms need to be more fully explained.

T2C: This proposes that networks for Active Travel should be planned at an early stage in Opportunity Areas and other growth areas. The beneficial results of such planning are not manifestly obvious in Opportunity Areas currently being developed and given that the Mayor often takes a lead on preparing Opportunity Area Planning Frameworks, there is little confidence that there will be a different outcome as a result of this policy.

T3 Transport Capacity, Connectivity and Safeguarding: The priority schemes in policy are mostly for radial routes and would reinforce London's travel and economic focus on commuting to the Central Activities Zone. This is not sustainable development. The Heathrow Airport access schemes relate to airport expansion and not to 'modal shift' of existing airport's traffic to more sustainable transport. The bus network, increasingly important for orbital connections, should be comprehensive, frequent, high quality routes, but only has a small paragraph (10.3.6). The Plan should be rebalanced to be more proactive in promoting orbital connections, which can include tram/ light-rail and conventional rail routes and interchanges, and improving the bus network, including demand-responsive services.

Table 10.1: Planning London's transport system inevitably identifies a catalogue of generic programmes and specific projects. However, these should be designed to make the system work better. For example, by promoting the exploitation of counter direction radial route capacity; the creation of interchanges – whether rail, bus, cycle, walk - to enable a wider range of destinations; and recognising air quality as a fundamental

determinant of policy and practice. Any/all proposals should be ‘future proof’ by ensuring their passive potential for further adaptability and extension/expansion/integration. All project options should be open to debate and their impact assessments available for scrutiny to ensure user consideration and suitability for local communities.

A suite of measures, mostly small-scale, but targeted to achieve in an incremental way a denser coherent and convenient travel network should be the output of the Plan that recognises its funding limitations. (See comments below on Policy 9 Funding). So the aim should be to plan and make the transport system work better. In this way of more and improved interchanges the progress to seamless journeys can be accomplished. The answer is not to build more ‘Crossrails’ whose funding is not assured and if funded would starve other proposals of scarce capital investment. Supporting the bus network would reap better returns.

Bus services & Orbital services: London’s predicted population growth will sustain improved levels of service and patronage. This will make feasible the intensifying and extending bus services coupled with the creation of orbital and long distance limited stop bus services. Orbital connections, which can include tram/ light-rail and conventional rail routes and interchanges, should be promoted. Bus reliability and affordability is a good objective to help a significant number of Londoners who depend on the buses, but too much relies on a reduction of traffic congestion to increase bus efficiency. Specific implementation proposals could include more segregated and continuous bus routes to overcome congestion delay, particularly in the light of growing distributed delivery services (e.g. Amazon) and private hire (e.g. Uber) which may well adversely affect congestion levels. There is a need to ensure that bus and rail services are closely integrated and linked and connect with transport for the wider South East region.

Demand-responsive bus services: would be particularly appropriate for those with disabilities or older persons, for example, having to attend medical appointments, luncheon clubs etc. from/at widely dispersed origins and destinations where conventional bus routes are relatively coarse-grained. This should be actively promoted to remedy the ‘accessibility deficit’ endured by a growing sector of the population. (See draft MTS Supporting Evidence: 2011-2041 GLA population change +28%, but for those over 70 years old, +85%). And given that community transport is likely to face increased demands as the elderly population grows in numbers and the service is faced with funding difficulties.

T4 Assessments and Mitigating Transport Impacts: T4D: That developments may be contingent on the provision of necessary public transport and Active Travel infrastructure as a policy requirement is not strongly expressed enough. Developments, in order to achieve sustainable

development should fully address their transport, and for that matter environmental, health etc. impacts, and support public transport networks that are able to accommodate any additional movements.

T5 Cycling: this promises that barriers to cycling will be removed; a healthy environment in which people choose to cycle will be promoted; by a London-wide network of cycle routes and appropriate levels of cycle parking. Current proposals, such as the cycle super highways, quiet ways and Mini – Hollands (cycle friendly low traffic areas) have yet to demonstrate critical mass take off. Cycling network should be comprehensive (fine grained) and segregated, covering all cycling needs and potentials, and not only super cycle highways, which are very high level. The ambition should be to achieve a take-off in everyday ‘civilised continental style’ cycling. Therefore, the policy and proposals should be explicit on the ‘normalising’ or ‘mainstreaming’ of cycling as the mode of choice, but requiring a transformational implementation strategy that progressively builds up the modal share for cycling.

T6 Car Parking, T6.1 Residential Parking, T6.2 Office Parking, T6.3 Retail Parking, T6.4 Hotel and Leisure Users Parking: these policies outline a reduction in parking to encourage more sustainable transport. Car-free development should be the starting point for all development in places that are, or are planned to be, well-connected by public transport. Developments elsewhere should be designed to provide the minimum necessary parking. However, reducing facilities for private vehicles may adversely affect the mobility of vulnerable and disabled persons. Carers may need cars to visit and transport the cared for. The elderly and others may not be sufficiently mobile to cycle or walk, even to public transport. Issues such as these were raised when Congestion Charging was proposed for introduction and the learnings from this should be more evidently applied. Strategies that harmonise parking policies with mobility and public transport policies should optimise connectivity and accessibility, particularly for the disabled and elderly. Reducing facilities can also hinder those who are often self-employed, that need vehicles which are their mobile workshops/stores (e.g. plumbers) in order to provide essential services to London.

More electric charging points should be provided, not just in new developments.

T6.2 should be retitled to ***workplace parking*** as it relates to more than office parking matters.

T6.5 Non-Residential Disabled Persons Parking: This is not precise and emphatic enough to ensure that London becomes fully accessible and user friendly to all as soon as possible. The proposed parking standards for the provision of disabled persons’ parking spaces should be doubled to cater for

presently unrecognised demand and the growing ageing population living with impaired mobility.

T7 Freight and Servicing: The promotion of an integrated approach to freight together with enhanced water transport to which road freight should be shifted should be both a strategic aim and incorporated into Policy. Freight and delivery vehicles in particular have been increasing their number of trips and are expected to so continue unless proactively managed. Rationalisation is needed. There should be a network of consolidation hubs and managed distribution for the final leg of delivery. Wide area wide restrictions on goods vehicles (other than permit holders) would direct freight into consolidation freight hubs which would manage and rationalize distribution. A surcharge/levy on central London business deliveries could assist reducing congestion.

T8 Aviation: The following does not imply acceptance of the need for airport expansion. As with many other forms of development, any expansion or intensification must have their environmental and health impacts fully addressed, not worsen existing air quality, and provide transport networks that are able to accommodate any additional movements.

T9 Funding Transport Infrastructure through Planning: the Mayoral Community Infrastructure Levy (MCIL) is restricted to funding strategic transport schemes, initially to Crossrail 1 (Elizabeth Line) and, if agreed, to Crossrail 2; if not, then to other strategic transport projects. Planning obligations (Section 106 agreements) will be sought to mitigate impacts and create the other transport and public realm improvements necessary to support London's growth. New (undefined) funding mechanisms will be investigated (10.9.5).

Going along with the funding issue are the cost to public finances, the opportunity costs of forgoing spending on other forms of public good – particularly “affordable housing” and social infrastructure, and the pricing of transport that becomes unaffordable because of the monies that need to be found for the many, large and expensive transport schemes.

This Plan does not provide evidence to give clarity and certainty on how transport infrastructure will actually be delivered and as well as not comprising the delivery of other kinds of infrastructure that London presently needs, and increasingly in the future will need; such as “affordable housing”, utilities, and the various essential facilities underpinning the social, environmental and economic fabric – schools, health centres, parks etc. Much of the Plan's realisation is predicated on the precarious premise that the Mayor will acquire new powers, particularly financial ones ((10.9.5, 11.1.32-33).It is also dependent on the willing collaboration of the boroughs.

The cost of the Mayor's Transport Strategy is estimated at some £82 billion unadjusted for inflation etc. (£3.3bn pa (from 11.1.26) times 25 years). Whilst the funding gap between this and known income streams is not estimated, there is an out of date estimate from the London Infrastructure Plan 2050 (11.1.11-12) for public sector investment (i.e. not just transport) which is £3.1bn pa unadjusted. However, the MTS's costing is advanced on the basis that this capital investment would represent three-quarters of the National Infrastructure Commission's recommendation for spending on economic infrastructure. But this represents the lion's share, if ever such sums became available, and would inevitably deny the meeting of other extensive demands for long term infrastructural renewal as set out in the London Infrastructure Plan 2050. There are apart from transport other priorities for essential infrastructure to remedy existing deficiencies and provide for predicted future population and economic growth. The Plan should be realistic about the resources likely to be available and reformulate its proposals and programmes accordingly. The Mayor shall have regard to, among other things, the resources available for implementation of the strategy (GLA Act 1999 Section 41(5)). As it stands, the Plan is not deliverable as it does not have a coherent financial plan.

As for funding, there could be various income streams and speculative financial tools and powers, but their feasibility and practicality are not detailed how they could be applied in an appropriate mix and scale to deliver the envisaged capital investment that will, in turn, also place additional demands on revenue spending. TfL's fare box has started to decline.

There is no objective evidence to indicate how a funding gap will be met, as possible sources are increasingly to be drawn on for council core budgets and possibly not available (e.g. business rates; borrowing against future business rates). CIL only makes a marginal contribution (£300 million to £16 billion Crossrail) and increasing the levy rates would adversely impact on development 'viability' and planning benefits, especially affordable housing. Tax Increment Financing (TIF) – to borrow off the back of predicted future revenue returns - would mean mortgaging the future, to be covered by future generations of tax payers. The capacity to sustain this level of borrowing is unpredictable and imprudent in the face of multiple uncertainties regarding the UK and London economies, as well as additional debt burdens already accruing to the Mayor associated with developments across London (such as Vauxhall Nine Elms presently and maybe at Old Oak in the near future).

TfL has reported to the London Assembly recently that there is a current dispute over who should pay for £240million for station design changes at Battersea Station on the Northern Line Extension. Keeping the station closed after the 2020 launch date is an 'option'. Committing to a programme of heavy transport infrastructure is imbued with risk. The proposals for meeting a funding gap are thus highly insecure and potentially onerous for current and future Londoners both in terms of a future tax burden, and possible unfulfilled necessities for investment other than transport.

As a consequence, **Table 10.1** is largely a wish list.

Affordable Public Transport: There is an important social dimension to transport, which, if it is to effectively contribute to proper planning of London and the achievement of sustainable development, should address affordability and accessibility. These are often of great concern. All elements of public transport should be planned and operated in an integrative way with fare structures, tariffs and facilities that enable all to readily access those services most appropriate to use. The report, “Living on the Edge” by London Councils et al, Dec 2015 revealed that low paid workers are disproportionately affected by rising transport costs. The cost of changing between bus and train can be relatively expensive – in a sense a double charge, making longer multi-modal trips unaffordable. Having a single transport operator within London would assist fare equalisation. The persistence and prevalence of low wage employment often means long and unsocial hours of work. Adding time consuming commuting to this ‘life of work’ as a consequence of having to use less expensive but more time-consuming travel options is detrimental to well-being. So too is the kind of spatial organising or planning of London that deliberately distances places of work from homes etc..

Waterways: are no longer termed the ‘Blue Ribbon Network’, and are subsumed into such Chapters as 7 Heritage and Culture, 8 Green Infrastructure and 9 Sustainable Infrastructure, with a reduction in policies and text. The ‘Blue Ribbon Network’ of the current London Plan should be reinstated to reflect the strategic significance of the interweaving and interconnected extent of waterways throughout London.

On the waterways there should be (more) multi-stop, fast ferry services, with TfL providing more resources for water transport (existing fare structure and waiting times are a barrier). Crossing the Thames by ferries has more merit than building more bridges, even if they are walking and cycling bridges. Shift road freight to rivers and canals by enhancing water transport opportunities, facilities and services. Operational facilities for water transport, to a degree, have policy protection through the existing London Plan 2016 (see policies 6.2 & 7.26), but satisfactory adherence to these is contested by developers etc.

Annex: Transport Objectives

Reduce Need to Travel by lifetime suburbs, providing key amenities and job opportunities locally **and Plan and Make the Transport System Work Better** with smaller scale changes balanced throughout London and greater public participation in transport planning

Promote Active, Affordable, Integrated and Accessible Travel that is the alternative by choice to car dependency: More investment throughout

London in walking, cycling and accessible transport, and in Outer London in public transport services, particularly bus services and Orbital Rail.

Improve environment and infrastructure: Strong road traffic reduction targets, fewer vehicles and cleaner vehicles; implementing London wide road user charging, strengthening Low Emission requirements to include cars and avoiding traffic generating transport schemes.

Promote an integrated approach to freight; With a network of consolidation hubs and managed distribution for the final leg of delivery. Shift road freight to rivers and canals by implementing the Blue Ribbon Network and enhance water transport opportunities, facilities and services.

Chapter 11 Funding the new London Plan

Policy DF1

Funding Shortfall (11.1.8-11.1.13): We note that the London Plan has a significant funding shortfall. Currently, the Mayor does not have the funding required to build the housing that London needs, and TfL is experiencing financial difficulties due to decline in government grant and fall in user numbers, which will begin to have an impact on services. Furthermore, the financial problems of the LLDC (which needs to repay funds spent developing the Olympic site) continue to cause concern. Public sector funding is mainly achieved through taxing or levying funds from businesses and individuals.

The London Finance Commission outlines the current fundraising powers of the Mayor, as limited to government grant, council tax and business rates, user charges, and third-party contributions such as MCIL. We note that the Mayor seeks devolution of fiscal powers, in line with the recommendation of the London Finance Commission (LFC), in order to give local governments more control over how public money is spent. The Mayor's key ideas for increasing revenue are: Fiscal Devolution (paragraphs 11.1.58-62) and Sharing in Land Value Uplift (paragraphs 11.1.63-65).

Both these plans are in their infancy, with no concrete proposals on the table, and are therefore unlikely to materially improve the funding for implementing this London Plan. Opportunities to raise loans for infrastructure development from business rates uplift may be constrained by the new role of business rates in directly funding core local council activities and TfL borrowing is restricted to potential for revenue increases (11.1.30). In relation to transport it is noted that, "However, most of the schemes listed in table 10.1 are currently unfunded and additional sustainable funding sources and project-specific deals and grants will be needed alongside contributions from London boroughs and the private sector." (11.1.30). This also relates to policy T9 C – using planning to fund transport. In this regard, it is noteworthy that the only policy box on Funding (DF1 Delivery of the Plan and Planning Obligations, p. 441) is focussed on "Applicants" – namely, private developers.

POLICY DF1

A key issue undermining the effectiveness of the London Plan is therefore the significant funding shortfall in relation to meeting its ambitions. Alongside private sector borrowing for utilities, and central government grant for some of the capital costs of schools (about 1/3 of needed – 11.1.35), policy DF1 indicates that S106 income and CIL charges levied on private sector led developments are the only real sources of income identified to implement much of the London Plan including MAJOR STRATEGIC TRANSPORT INVESTMENTS and HOUSING DELIVERY.

Although the Mayor argues that "The policies in the London Plan have been subject to a viability assessment which has tested the cumulative impact of relevant standards, obligations and requirements to ensure they do not put implementation of the Development Plan at serious risk.", we argue based on

evidence from the London Plan Viability Study, the London Plan IIA and the Homes for Londoners SPG that this is not an accurate representation of the funding situation. There is not a feasible funding plan in place, which puts at significant risk the delivery of the London Plan policies, notably its overall ambition for supporting “good growth”. We also note that S106 is barely mentioned in the London Finance Commission deliberations (a brief mention on p. 9, as part of the Levies on property development which can be raised by London’s government).

The London Plan Viability Study assessed the viability of a range of sites and development types to deliver the planning obligations implied by the London Plan. The conclusion reached here is that a wide range of sites are viable at some level of delivery of housing (discounted market, London Living/Affordable Rent, Shared Ownership) with some combination of housing tenure and type (LAR, LLR, SO) as well as student and shared accommodation, commercial and industrial developments.

In relation to London Plan funding, we are concerned about the following sequence of statements in the London Plan Viability Study:

Point 5.8.19 and 5.8.20 indicate that average CIL charges (perhaps underestimating viability in some cases) and £1500 S106 charges per dwelling are costed in the viability model.

Sensitivity testing was done in relation to “abnormal costs” (9.3, p. 71), with modeling of abnormal costs for developments (p. 32-33) including demolition costs (£29/m²) and “for example, service diversions, cut and fill/transportation, use of retaining walls, removal of underground services, amongst others” (modeled at £183/m²). These raised some questions about viability in lower band value housing; as did the higher land value benchmarks (p. 72). In general viability challenges are seen to result from low value areas i.e. where sale and rental returns will be in the lower value bands.

The findings of the Viability Study are considerably more nuanced than either point 11.1.1 in the London Plan or the conclusion reached in the IIA (pgs. 303-304) and observe that this has not been considered in any detail in relation to the potential to deliver SHMAA identified housing need through the SHLA identified land availability:

“14.2.6. The addition of an allowance for abnormal costs has a bigger impact on schemes in the lower value bands than those in higher value bands and may tip a scheme over into non-viability. However, the addition of grant (we modeled at £28,000 per affordable unit) improves viability and can help secure more affordable housing in some cases. Away from the lowest value area (E), grant can directly impact on the amount of affordable housing achieved although the picture is mixed and varies between the type of development illustrated by the case studies (e.g. two case studies in value area D were originally tested at 20% as they were unviable at 35%, and with

grant one of them is able to provide in excess of 35% while the other is not). “ (VIABILITY STUDY, p. 102).

However, we are most concerned with the following observation, made about development costs in addition to the modeled abnormal costs:

“5.6.14 Some sites have other costs that are exceptional, reflecting the specific development found there, and which are not readily replicated for policy testing purposes – for example new transport or social infrastructure. While sites have been tested with onsite and offsite infrastructure

requirements, ***scenarios with very substantial exceptional costs are atypical and lie outside the scope of this testing.*** Such schemes may be subject to site specific testing where the infrastructure cost is preventing delivery. It is also noted that, where there are exceptional development circumstances and associated costs, these may enhance market values and/or increase costs and it would be expected that these would be reflected in the land value for the site. Furthermore, it is understood that the GLA also engages with landowners and developers and provides funding to accelerate delivery on brownfield land such as in Housing Zones and facilitates funding bids from sources such as the Housing Infrastructure Fund.”

(VIABILITY STUDY, P. 33; emphasis added)

We place this alongside the following observations from paragraph 2.04 of the London Plan:

“The areas that will see the most significant change are identified as Opportunity Areas. Many of these Opportunity Areas are already seeing significant development, and they all have the potential to deliver a substantial amount of the new homes and jobs that London needs.” (DnLP, p. 27).

And from the Mayor’s “Homes for Londoners: Affordable Housing and Viability SPG”:

“2.8.0. Opportunity Areas and Housing Zones are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. They are also of a scale that can create fundamentally new places and communities. Significant research and an in-depth understanding of the area, its strengths and weaknesses, and how to deliver a successful place underpin the development of an Opportunity Area Planning Framework.” (p. 31).

As a response to the evident challenges and costs of developing many opportunity areas, the SPG (2.8.4, p. 32) advocates setting local thresholds for affordable housing delivery through local plans, including varying housing mix and tenure, in OAs, HZs and SIL, possibly lower for some (OAs – as implied in the Draft SPG) and higher for others (SIL), although the expectation is expressed to meet the AH expectations, we contend this is highly unrealistic in terms of delivery achievements across the city in Opportunity

Areas to date. The lack of any review mechanism or monitoring of delivery in Opportunity Areas is an ongoing concern.

However, if most housing is to be delivered in Opportunity Areas, and Opportunity Areas are by definition hard to develop, involving extensive infrastructure investment (a £1bn TIF to fund new tube developments at VNE and a £2.5bn bill for OPDC are only two amongst many examples), the London Plan Viability Study is offering little support for the planned approach to funding the London Plan.

Thus most large areas of planned housing development are in hard to develop, low viability areas that lie outside the scope of the London Plan Viability Study models and parameters.

We contend that in the light of this, the claim that the overall viability of the plan is secure is inaccurate AND the developer-led planning gain approach taken to Funding the Plan in Policy DF1 makes it ineffective and unsound.

This concern was also reiterated in the IIA:

“It was also suggested that the policy could reference the role of density in bringing forward brownfield sites, and how this could impact on viability”. (p. 303)

The GLA’s response to this was to affirm that development should be focused on brownfield land, but that “They also advised that the viability study that accompanied the Plan clearly showed that the policies within the Plan were viable and policy DF1 was explicit that viability issues should be exceptions to the rule.” (p. 303). There is no adequate response to this concern.

Furthermore the IIA assessment of the implications of this observation is weak or non-existent – the table on p. 304 of the IIA shows no entries for Objective 7, for example, where the implications of lack of ability to meet planning obligations for equalities, health and social and community safety can surely not be filed as “not applicable”. This throws a spotlight on the limited and formulaic nature of the IIA.

Policy DF1 is therefore not fit for purpose and needs to be reconsidered. This arguably renders the plan ineffective and undeliverable, which are key criteria for assessment of the soundness of the Plan.

POLICY DF1 D: Prioritising Transport and Housing

The following section considers further implications of Policy DF1 for the London Plan and for London’s communities in more detail, notably its proposal to prioritize funding transport and housing from S106 charges.

A new route for developers to bring forward proposals to planning authorities without evidence of viability testing is offered, but “where there are clear circumstances creating barriers to delivery”, viability testing procedures are presented in the Affordable Housing and Viability SPG, and also discussed in Policy H6 A to C. Here, since strong cost pressures exist in relation to bringing forward brownfield, or sites in existing use, or contaminated sites, or inaccessible sites, a prioritisation of use of “planning obligations” is proposed: first affordable housing and public transport; followed by health and education infrastructure; and finally, “affordable workspace and culture and leisure facilities in delivering good growth”. The overarching goal of this plan, “good growth” is therefore accorded the lowest funding priority.

We also note the wording: “where it has been demonstrated that planning obligations cannot viably be supported by a specific development” – exposing the development model whereby each individual development is meant to generate significant planning gain income to unlock whatever infrastructure is required. Clearly this is not a viable model of development for a major metropolitan region and both expansion of resources and much stronger pooling of available income streams to enable strategic investments is arguably required, rather than burdening specific developments to the point where they are in danger of not delivering London Plan policies.

This policy directs that the highly constrained funds available to deliver this plan (both S106 and CiL charges) are applied AS PRIORITY to the two areas where the Mayor in fact has some scope to secure investment: transport and housing. Dipping into the S106 agreements, which are primarily meant to ensure that developers implement planning policy, in order to primarily fund major infrastructure requirements to unlock sites will render the plan ineffective as a planning policy. It will jeopardise the ability to deliver the basic requirements of sustainable urban development: including provide play spaces, protect green and open spaces, protect and re-provide community facilities. Time and again these elements of lifetime and sustainable neighbourhoods are poorly provided in large scale developments, in increasingly hard-to-develop “opportunity areas”. In addition, brownfield sites with high infrastructure requirements seldom yield much in the way of social rented housing – much “affordable” in these schemes is in fact shared ownership or discounted market. This means a lack of ongoing investment in community needs.

We note from the London Plan Viability Study the following two observations:

The point in 5.8.1 that notes how **many planning policy obligations in fact enhance the value of a scheme**. Diminishing “good growth” elements of the London Plan would detract from the economic return and “taxable” value of places being built, in addition to making them bad places for Londoners to live in.

The viability study also notes:

“14.2.9. Other policies of the plan have also been tested including accessibility and energy standards, transport, community and green infrastructure requirements and Mayoral and Borough CIL and S106. These represent **modest costs as a proportion of development value and typically have limited impact on overall viability.**” (p. 103).

Thus we propose that there is no sound basis for diminishing the implementation of key features relevant to the delivery of the community and social infrastructure needed to ensure “good growth”, sustainability and lifetime neighbourhoods, and even to maximise the value achievements of developments, and we propose that this policy be reversed:

Proposed change to Policy DF1D: We propose to delete the current sections and replace them as follows:

In order to ensure that all developments meet London Plan policy obligations, planning authorities should firstly apply priority to social and community infrastructure and social rent level housing delivery and then to affordable workspace and local transport schemes.

Communities must be a party to the s106 negotiations as they best know the needs of the local area.

We encourage the Mayor in his efforts to secure proper funding for housing and transport, as per the London Finance Commission work, Text 10.9.5 and 11.1.58-65. Planning gain is not an instrument which is adequate to deliver the substantial infrastructure requirements of this London Plan given that owners of land and housing (public and private) can still realise big profits which need to be appropriately taxed in other ways.

However, we suggest that providing lifetime and sustainable neighbourhoods is crucial to support London’s role as an attractive city for both local residents and successful economic activity and to meet his obligations not to cause Londoners harm. Squeezing housing and transport funding out of S106 and CiL charges on specific local developments risks undermining the quality of the built environment. Bringing forward the example of the Old Oak Park Royal Development Corporation, which is an opportunity area with a £2.5bn infrastructure price tag, the Mayor himself observed in his [Review of the Old Oak Park Royal Development Corporation](#), that lack of core financial investment for infrastructure and consequent reliance on planning gain would, “In addition to impacting on the ability of developments to provide an acceptable level of affordable housing, the high cost of infrastructure may force a quantum and scale of development that is unacceptable in height, scale, density or mass – and at the expense of community infrastructure.” We note that of the planning determinations to date in the Old Oak area, only 30% of affordable housing seems to have been delivered, 35% being discounted market rents of 50-80% and the remainder are intermediate products. We also note that restricted public realm and planning obligation requirements

(including numerous playgrounds on the roofs of buildings, which do not conform to DnLP Text 5.4.3 or Policy S4 B2, both of which were expectations in the previous London Plan. (This and further details are available in the Grand Union Alliance, submission to consultation on Regulation 19 OPDC Local Plan).

POLICY DF1 A, B C

Public Scrutiny of Viability and Planning Gain agreements: The fast track approach potentially further limits public scrutiny of developer proposals. This speaks to our ongoing concerns about the lack of clear policy commitment to community participation in planning in major development sites (see our comments on Chapter 2: Opportunity Areas, Town Centres, Strategic and Local regeneration).

We wish to further press our concerns about the question of public participation in planning on the basis of the over-riding role of private developers in delivering and funding this London Plan. The Mayor does not have a Statement of Community Involvement. This is a significant lack in a context where the Mayor's team is closely involved in planning developments across the city, notably in Opportunity Areas and large scale regeneration. Such an SCI should be produced as SPG to guide all planning and development in the city, and should be summarised and referred to throughout this London Plan. SCIs have been developed by the LLDC and the OPDC.

The need for an SCI with clear guidance on the nature of participation in planning is enhanced in a situation such as envisaged in Policy DF1 A to E and the text of Chapter 11 of the Plan, where most development is to be funded and undertaken by private sector developers, even if some funding from government housing grant or public utility borrowing is available. Details of developments highly relevant to local stakeholders are negotiated and agreed in secretive pre-application discussions from which community voices are absent. We would like to see the Mayor bring forward a best practice guide for planning authority and developer consultation practices, consistent with the Aarhus convention, involving early and effective involvement in decisions. This is especially important given the high legal stakes associated with refusing or seeking to revise planning applications once they have reached the determination stage. Robust and effective developer engagement with communities, overseen by relevant planning authorities, where community concerns are clearly addressed, and early input to the development of plans and alternatives facilitated.

Without clear public scrutiny, safeguards and guidance on the role and behaviour of private sector actors and planning authorities as they negotiate the planning gain obligations in the development process, the Mayor's Plan will not be effective in its aims to meet community needs, or to include communities in decision-making and planning for their neighbourhoods .

PROPOSAL: Insert a statement in Chapter 1 policy box GG1 (and refer to this in other relevant Policies, such as DF1 as well as HD1 and in SD1, SD4, SD6 and SD10) committing to the preparation of a Best Practice SPG on Public Participation in Planning/Statement of Community Involvement.

Conclusions

Clearly housing delivery and transport infrastructure are critical areas for investment but there is also a significant need to invest in other things such as: green and social infrastructure, water, energy, waste and digital connectivity. Regardless of the “good growth” ambitions of this new London Plan, and its range of sustainable planning policies, the absence of funding, and the dependence on private sector developers for delivery mean that the plan is creating a situation in which planning decisions will likely continue to encourage developments that significantly contradict the goals of the London Plan and fail to realise the principles of “A City for all Londoners”: the antithesis of good growth.

Chapter 12 Monitoring

Just Space starts from the position that the London Plan is meaningless if the implementation of its policies cannot be effectively monitored. We have been concerned in the past with the rather simplistic monitoring of the London Plan and its failure to address the social dimension of planning. Now we are presented with just 12 Key Performance Indicators (KPIs), down from 24 KPIs in the current London Plan; the justification for this slimmed down schedule should be open to discussion.

Given the range of statutory duties on the Mayor, including the achievement of sustainable development, and the Mayor's A City for All Londoners, Just Space has proposed a rebalancing of indicators across the 3 dimensions of sustainable development. That there be more on social and economic dimensions with some of the environmental indicators, particularly the more nuanced ones, being adopted by the London Sustainability Development Commission (LSDC), whose monitoring role [see London Plan IIA SR para 7.5.4] would benefit from a higher profile.

Our proposed list of monitoring indicators which should all be reported in the Annual Monitoring Report is:

Fair and inclusive city: with a particular focus on equalities – gender, ethnicity and disability – and the socio-economic. Race on the Agenda, Women's Resource Centre, Equality Trust, My Fair City and disability organisations could assist on this.

Civil society: measuring its development across a range of issues and levels of participation - not just volunteering levels - including the diversity of voices being heard and the degree of achieving impact, levels of trust in authorities.

Health: at least, add in healthy life expectancy and infant mortality rates, together with groups with protected characteristics.

Economic: in-work poverty, household income after housing costs, gender and ethnicity disparities, diversity and range of offer of businesses, good jobs that are secure paying at least the London Living Wage. Note that these indicators have been given detailed expression in Just Space Towards a Community Led Plan.

Workspace: monitor low cost workspace and affordable workspace using all proposed use classes, beyond B1

Employment: monitor apprenticeships, local jobs, job types and sectors, the quality of jobs

Housing: monitoring of gains (and losses) of dwellings in each rental category and requiring the Mayor to work with boroughs to ensure that agreed rental levels and tenure mixes are sustained in the long run by providers

monitoring compliance with internal space standards and external playspace/open space standards

meeting the local and diverse needs of people, using such measures as the proportion of local waiting lists able to afford new homes locally on offer, community-led housing, specialist priorities.

Environment: measuring the progress towards lifetime neighbourhoods and lifetime suburbs (as an additional spatial development option).

Societal trends and issues: Whilst most indicators need to be quantitative, it is important to have an indicator(s) that is **qualitative** to allow for context and meaning. This can be achieved by making use of the Justmap surveys of London's community groups at an appropriate time before each Annual Monitoring Report.

Air Quality: of the proposed 12 KPIs in the Plan, given the prevailing illegal levels of polluted air, this is the least effective in measuring positive change. Currently, and this will continue to be so if the Plan is adopted, it is a policy requirement that developments should be at least Air Quality Neutral.

Since the primary focus of Air Quality policy is to remedy the illegal levels of pollution, especially for vulnerable people, there could be more incisive KPIs. For example, the populations living within legal and illegal areas of pollution and the population data could drill down to identify the sizes of the vulnerable cohorts and the trends over the years monitored. This would have the distinct merit of seeing if the Policy and Proposals are actually having positive effects.

There are many policies to cover here and we propose that the concluding section of each chapter should have its own sub set of monitoring indicators. It is also important that the GLA commission reports on the delivery of other policies for which there is not a KPI. One component of such work, which we have repeatedly called for, is longitudinal tracking of people and enterprises over the years to evaluate the impact of policies.

Some of the chapter responses have made comments on indicators that could be usefully used at this topic level whilst still having a set of higher level KPIs that are meaningful and relevant. Evaluation and monitoring, consequently, will be problematical without further targets, milestones and indicators relevant to the various Policies of the Plan.

Reviewing the progress of the Plan is not only an issue for the Plan-Monitor-Manage methodology of plan-making, compliance with the Strategic Environmental Assessment Regulations but one of wider democratic accountability whereby Londoners can participate in the process, enabled by ready and easy access to information.