

MBUL1 Spatial Strategy

Response by Just Space www.justspace.org.uk

Just Space, a pan-London informal alliance of community groups, campaigns and concerned independent organisations, often working with the Bartlett School of Planning, aims to improve public participation in planning and make policy fairer towards communities in a system dominated by the interests of developers. This submission is the result of 3 years of consultation in preparation for the draft Plan, with the participation of dozens of groups, including three conferences and the production of an [Alternative London Plan for a Caring City](#).

We request to speak at the Examination.

As set out, this policy is unsound as it is inadequately supported by robust and/or accessible evidence and is therefore not justified and/or effective, as set out in our critique of Chapter 1:

Firstly, the strategy – which is explicitly¹ a continuity with the strategy in the current LP – is unsound because it is not based on evidence of an analysis of how efficacious this strategy has been: targets have been missed by a long way; the housing affordability crisis deepens; housebuilding has slowed dramatically; households and children are squeezed out of inner London; housing waiting lists, overcrowding, homelessness and temporary accommodation have steadily increased, etc.

Secondly, the housing target-driven approach (part B of the policy) doesn't prioritise addressing need - it is about encouraging economic growth²; furthermore, the emergency powers and reduced affordability requirements run counter to the ostensible second Good Growth objective 'Delivering the homes and neighbourhoods Londoners need'. London does not need more unaffordable housing, as this will not bring down house prices significantly.³

The proposed quantum of additional new homes is not supported by an appropriate and/or accessible evidence base. The Plan proposes that Local Plans should support significant growth on small sites, but doesn't provide sufficient evidence that the expected level of delivery on small sites is achievable: the draft Small Sites Design Code only became available towards the end of the consultation. Its late production suggests that it could not have fed into the evidence base when forming the policy. Boroughs have not had sufficient time to properly interrogate this key part of the supporting evidence base.

Furthermore, it's not clear how the objective to maximise the delivery of genuinely affordable housing and the 50% strategic target will be delivered, given the reduction in the affordable housing requirement on public and industrial land and scope for reduction of the affordable housing threshold on other sites. The differentiated approach to affordable housing, reducing the proportions of affordable housing in the outer boroughs to 20%, is likely to result in a significant split between the less dense, leafy but car-dominated suburbs – with industrial land increasingly

¹ 1.7

² "The new targets will boost housebuilding in areas most in need, to help more people buy their own homes, and help drive growth - making everyone in the country better off." Our Plan to Build New Homes, HM Govt, 30/07/24

³ OBR, March 2025, 2.62, 3.37, 3.42

substituted out to the fringes – and the high-density areas of inner London with much higher proportions of affordable housing and increasingly fewer employment opportunities.

We have strong concerns regarding the rationale to review industrial land designations, which is inconsistent with the NPPF's objective to support long term economic growth. The release of Locally Significant Industrial Sites in particular would result in unhelpful speculative pressures and a significant erosion of employment space and in turn reduce job opportunities for local residents and communities.

The 10-year key diagram doesn't provide clarity. For example, large amounts of the diagram appear to be covered by Environment Opportunity Areas which are ill-defined in the Glossary and barely explained in the text, apart from a sketchy reference in GHR9 Clean and healthy waterways – although most of these wide areas appear to be made up of regional parks and open spaces like Epping Forest “which are likely to have potential for enhancement to increase their reach/capacity”, running counter to the fact of their location (at relatively inaccessible parts of London) provides an explanation as to why they have thrived and why they are special.

Disentangling the tensions inherent in Opportunity Areas in the CAZ is supportable, although not fully justified. The re-designation of the five major central London mainline terminals as ‘Transformational Gateways’ and not including any of them in the list of tall building locations is helpful, for example, in reducing the amount of land locked into spiralling speculation with no development delivered⁴

Whilst support is given to the prioritisation of housing and transport in developer contributions under A(4), sufficient funding must remain available for the site-specific and strategic mitigation required to make development acceptable in planning terms. Section 106 obligations are often used to mitigate a development's off-site impacts, such as improvements to local parks, street trees, public realm and highway infrastructure. In practice, the increasing pressure to secure affordable housing and transport funding has reduced the scope for securing some of these. The Plan should therefore avoid creating a policy that further concentrates Section 106 funding on housing and transport at the expense of other necessary mitigation, which remains essential to being acceptable in planning terms and to the requirement for sustainable development.

⁴ For example sites around Waterloo Station which have been the subject of a series of increasingly tall permissions: at Elizabeth House, for example, four permissions over 30 years have driven upwards incrementally to 130m, but the current landowner has finally declared such ambitions undeliverable (the site sits atop 4 tube lines) and proposes (after 20 years of vacancy) to refurbish and extend the existing building.

MBUL2 Optimising the use of land and site capacity

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This policy is unsound because it is not positively prepared, justified or effective – in fact it is dangerously misguided.

This policy approach relies on assumption in favour of densification without the evidence base or analysis that this will help delivery, viability, or maintaining sufficient affordable housing, or other objectives, including the Good Growth objectives (“Delivering the homes and neighbourhoods Londoners need” or “Creating a greener, resilient and healthy city”).

Firstly, the implications of this policy are impossible to understand without the Small Sites Design Code, which was only placed on consultation late in the process in September, and is on consultation until December. More time is required to digest the impact of this on MBUL2 (and on the housing targets, when the SHLAA identifies a significant proportion of new stock coming through small sites) and suggest we have until the SSDC consultation ends to do so.

This policy emerges out of the desperate wrenching of planning towards meeting unachievable housing targets, in a continuation of an approach which has failed to resolve the acute social housing crisis over the past 18 years, without providing any acknowledgement or analysis of that failure. First the Mayor came for the Opportunity Areas, then the town centres... and now the Mayor is coming for all land, everywhere, checking every pocket, using a methodology of mapping pseudo-typologies to public transport accessibility to identify areas which purportedly warrant redevelopment to higher densities.

The concept of higher-density living is fine, and in a perfect world might be achievable. But planning does not operate like that; it works in a world determined on the one side by developers seeking to make the strongest return out of manipulating the endless flexibilities of our planning system, and decision-makers too often chasing short-term objectives, missions and targets.

Firstly, the policy is primarily focused on understanding the city as a space for buildings. Part A (1) reflects the focus on the built form rather than the people occupying these buildings, the deprivation and demographics, the culture, employment and retail patterns, and all the other spatial complexities of real life in London. In Part A (2) character studies based on “detailed local knowledge” are proposed, but only “where appropriate” and without proper guidance. The result is that local authorities have been producing ill-informed character studies focused on heritage and views rather than the lived experience of real people. These are then used, along with the London

Context Map produced by Allies & Morrison, the SAM maps, and the Optimisation Framework, to mistakenly identify whole estates which should be demolished and rebuilt at higher densities with market housing, not because the estate is in disrepair or suffering from social problems, but simply because that's where this methodology leads us.¹

The Optimisation Framework (OF) is fundamentally confused. Optimization is defined in the current London Plan: "Good growth across London requires development to optimise site capacity, rather than maximising density". But its role in the draft London Plan is as a mechanism to maximise density. The OF sets out wide ranges of heights and densities for areas, depending on their accessibility and 'typology', but then declares these "*minimums should be exceeded... particularly in better-connected locations*".

Setting minimums without maximums is the route to maximisation, not optimisation. The Govt's Design and Placemaking PPG guidance (referred to at 2.25) states "*Density is an output of the design process, and to incentivise efficient use of land, a design code can set minimum density standards for a given area in conjunction with requirements which specify the maximum built envelope*"

Setting *minimum* densities undermines the staged approach within the OF; it's more suitable to set maximum densities acting as envelope parameters, as in the govt guidance. The desk-based assessments to reach OF densities will never be able to fully account for design limitations on specific sites that would render denser development unsuitable – the risk is that developers use minimums to frame otherwise unacceptable development as acceptable.

The OF relies on a London Context Map which categorises all built-up areas into six typologies (e.g. 'outer suburban', 'inner urban terrace', 'large town centres'). Whilst the idea is interesting, the delivery is completely crude – there are many areas which defy these designations, and there are many areas for which no typology is defined. Furthermore, it is riddled with inaccuracies, although these could in theory be corrected. But it is fundamentally flawed because it does not overlay a map of the indices of deprivation and other community measurements. Instead it is laid over a map which categorizes 'Sustainable Access Measure' (SAM, replacing PTAL), and minimum density ranges and heights are proposed for each typology, dependent upon its SAM rating. This sounds complicated, but is in fact dangerously simplistic, and can lead local authorities to inappropriate conclusions about the potential for redevelopment. The LP allows councils to complement this crudity with more detailed local 'Character Studies', but examples seen so far (such as in Lambeth and Greenwich) focus on the built environment (including heritage) but ignore the social context: demographics, deprivation, neighbourhood, community need. They should also "not seek to reduce ambition or deviate from the overall scale of ambition needed" (2.31)

The specification of these minima (optimisation) at this very high level spatial scale without regard to actual places and existing assets raises strong concerns, and mitigation for that is not dealt with in the policy. This is not appropriate for a planning document, and would be better placed informing supporting documents like the SHLAA.

The concern is that, flowing from this policy, LDOs could be applied almost anywhere, and that combining parcels of land for development (perhaps linked to CPOs?) to these minima could see

¹ Example: Woolwich Dockyard, a Site Allocation (in the LB Greenwich Reg 19 Local Plan) created through this method, along with 50 other Site Allocations across the borough, as Greenwich chases a target of producing 30% more homes throughout the borough in 10 years, far exceeding the GLA target set

dispossession of property rights for ordinary Londoners, and could be targeted at poor neighbourhoods or minorities. It could encourage rogue developers to apply pressure on tenants and owners.²

This policy would be much better placed in an LPG, stressing the indicative nature of the process, and emphasising that these will be dependent on local planning assessments, and that they cannot be used to overturn planning designations to protect certain assets or certain kinds of housing eg social rent housing or family housing (a category some councils try to protect from development and subdivision).

This process needs to respect existing character and valuing of places and neighbourhoods in making a plan led place vision where optimisation is focussed. There should be caveats and constraints on the use of LDOs in relation to small sites and individual owners, as well as social and community assets. And an equalities impact constraint is essential.

There is a lack of assessment of how increased density increases strain on social infrastructure. The process initially acknowledges these sensitivities, then allows (and even encourages) them to be ignored by encouraging additional density. In any event the OF is based on an assumption in favour of densification without a sufficient evidence base or analysis that this will help delivery or meet need. These issues spill into considerations of tall buildings and mid-rise, Policy MBUL3.

The whole policy needs to be re-thought and re-drafted. For example:

2.31 LPAs ~~can complement this will provide through more detailed local studies (or revise existing character studies where needed to provide more detail, improve precision and reflect changes due to recent development). These studies can further inform planning for growth and identifying the varying sensitivity of different areas, but they should not seek to~~ **confirm or** reduce ambition based on local context ~~or deviate from the overall scale of ambition needed.~~

This change is needed as it is at odds with 2.26 “The appropriate density and height for development within the range will be informed by a number of factors, such as how sensitive to change an area is.”

² Witness the Old Oak experience where there was heavy pressure from CarGiant and other business owners to sell.

MBUL3 Tall Buildings

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The policy is unsound because it is not the most appropriate strategy against reasonable alternatives.

Just Space supports the principle of providing a strong strategic framework limiting the location of tall buildings over 100m across London. We welcome the recognition of the particular need to define and constrain taller buildings over 100m. However, we remain concerned that there is little analysis of the multiple negative impacts of tall buildings and the need for much greater restraint. We are equally concerned that the policy doesn't clearly deal with the problem clarified by the Master Brewer case – that tall buildings can be approved outside locations identified in the development plan, and are in fact subject to the same tests as those proposed for locations identified in the development plan as suitable – thereby effectively rendering the location exercise redundant.

Tall buildings over 100m present significant problems in terms of a range of issues beyond the usual concerns of impact on townscape, heritage, views, microclimate, overshadowing and social exclusion. In particular, tall building policy has had damaging impacts by raising land values and encouraging speculation, which blights development sites. In doing so, tall buildings proposals are working against the urgency required to tackle the crisis. Being inevitably controversial and inherently a challenge to planning policy, tall buildings proposals require longer in pre-app and at the decision-making stage. They encourage speculative proposals, since their height is only limited by constraints enforced by the planners and decision-makers. Requiring high quality of design and testing of many aspects, they generate greater costs at application stage. Their construction cannot be phased, and so their implementation is inherently more risky. All of these factors contribute to tall buildings permissions taking years to achieve and even more years to implement, on sites which often lie vacant in the meantime. There are many examples of residential or mixed use towers taking sometimes decades to be developed.¹

The Greater London metropolitan area contains the second most skyscrapers of any city in Europe. 121 buildings that are at least 100m across London (the proposed Metropolitan tall building), 24 in the City of London and 27 in Canary Wharf. 587 more were in the pipeline in 2024 (310 with full

¹ The Shard: proposed in 1998 but not completed until 2013, 15 years later; The Vauxhall Tower: site purchased in 1997 and pre-app'd from 1999, but not completed until 2014, 15 years later
Doon St tower and leisure centre: pre-app'd from 2003, permitted in 2008, but remains unbuilt, its site vacant for over 20 years; 18 Blackfrairs (Southwark) lay vacant from 2003, pre-app'd from 2004, permitted 2009, 2017, 2023, yet still vacant 22 years later; Elizabeth House (Waterloo) permissions granted for tall buildings 1996, 2013, 2021, none built, the site blighted for 29 years

permission, 127 under construction) which could provide over 90,000 homes, but only 48% are located close to public transport links. Tall buildings became fashionable again amongst planners and politicians in the later 1990s, with the idea that a high-density 'compact city' with tall buildings - for housing and offices, clustered at transport nodes - would reduce the need to travel and reinvigorate our town centres. This 30-year experiment has transformed London's skyline, but has clearly done nothing to alleviate London's housing affordability crisis.

Most tall buildings provide very little affordable housing – either social rent homes or market homes that families can afford – the result of high land values inflated by speculation and very high construction costs as a result of their form, which cannot be phased. Many market homes are sold pre-construction to overseas investors, and flats are often left vacant². Clearly this is not Good Growth and does not meet the needs of Londoners or provide the residential accommodation London needs. In central and inner London most new tall buildings are the most valuable part of a wider development, and so as many as possible are retained for market sales. It is rare for developments to mix affordable or social homes with market homes; it is therefore rare for tall buildings to contain the required element of affordable/social housing: instead this is provided in an outhouse, often of a different architectural quality or off-site entirely. The latter in particular can positively reinforce social exclusion.

Not only does this simply mean instant gentrification, it can result in sterilisation and social exclusion. And, despite this plethora of tall buildings, built up over decades, in total they would only have contributed a little more than one year's housing supply in the current government's target of 88,000 new homes per year across London. Tall buildings can never play a significant part of addressing the housing affordability crisis. Residential tall buildings are part of the problem, not the solution. By pushing up land values, they are driving issues of unaffordability, while creating areas of exclusion where communities do not thrive.

Many tall buildings contain the 75,000 vacant homes estimated in the capital.³ It is estimated that property to the tune of £20 billion remains empty across London.⁴ It is extraordinary that the GLA has not published any significant research into how widespread this problem is, given that it is perceived by the general public as part of the scandal of the housing crisis. This contributes greatly to the sense of illegitimacy and to the ubiquitous opposition to tall buildings proposals, which herald a gentrification benefitting investors, contrary to the needs of residents.

When they are being developed, they raise significant issues, such as generating disproportionately large embodied and operational carbon emissions. Up to 40% of carbon emissions in London result from construction. Greater London consumes 3.3million cubic metres of concrete annually. The carbon footprint from concrete alone in London is 2m tonnes. The carbon footprint of just the concrete used in construction is equivalent to over 30% of all the transport emissions across London. Tall buildings rely more heavily on concrete in construction than traditional housing typologies, and are very carbon heavy, requiring considerably more concrete for their size than lower more

² Only 12 of the 200 flats occupied in the Vauxhall Tower when investigated: [The London skyscraper that is a stark symbol of the housing crisis | Housing | The Guardian](#)

³ Action on Empty Homes

⁴ [Mayor of London and Westminster City Council call for stronger powers to crack down on long-term empty properties in London | London City Hall](#)

conventional buildings. There are alternatives, particularly CLT, which are perfect for lower buildings up to mid-rise, and are also more efficient. Tall buildings are disproportionately carbon intensive to construct; they are also disproportionately carbon intensive to maintain. Environmental conditions are more extreme at higher altitudes, for example colder in winter, more exposed to solar gain in summer, and more exposed to high winds at any time.

Considerable evidence has been amassed by Professor Philip Steadman at UCL which demonstrates that the amount of carbon required to power and maintain a comfortable environment in a tall building becomes increasingly larger the higher a building goes above 6 storeys. Dr Steadman is one of the founders of the Building Stock Laboratory in the UCL Energy Institute, which works on modelling energy use in the building stock of Britain, and associated emissions. The Lab has developed the London Building Stock Model and the London Solar Opportunity Map for the Greater London Authority. The Lab is working presently on the National Buildings Database for the Department for Energy Security and Net Zero, which will cover all buildings in England, Wales and Scotland, and will be a major instrument for national policy-making on energy in buildings.

Finally, tall buildings are inherently difficult and expensive to refurbish or repurpose. Being one vertical building does not lend itself to phasing or partial refurbishment, and this can financially cost as much as demolition and rebuilding, as demonstrated by the recent consideration of Citibank for the future of their 30-year old HQ at Canary Wharf.⁵

Table 2.2

The policy appropriately identifies in the LP locations for metropolitan-scale clusters, and does not allow boroughs to identify such locations. This approach is supported where the clusters set out in Table 2.2 are existing clusters. However, the policy on this point is contradictory. The policy allows boroughs to define cluster boundaries and identify suitable locations for non-Metropolitan tall buildings (i.e. below 100m) through local plan-making, having regard to local context, heritage, evidence and design considerations. This appears sensible: however, an unintended consequence of **Box MBUL3 Part 2** is that in using their powers to define these locations for non-Metropolitan tall buildings, and then allowing Metropolitan tall buildings to be located there after all [under Part A (3) in conjunction Box MBUL3 (2) vi], the boroughs effectively have the power to identify locations for clusters of Metropolitan tall buildings outside the 17 locations identified in the London Plan Table 2.2.

CHANGE REQUIRED: Remove everything in Box MBUL after Part 2 the first sentence.

Limiting Metropolitan tall buildings to 17 locations is a strategic matter which the Mayor should control through the LP. The policy is extraordinarily complex on this point and needs to be amended to provide the clarity that strategic locations for Metropolitan tall buildings can only be defined in the LP [as stated at Development Management A (2)], and not through the backdoor method described above.

Plan-making A(1) The proposal that authorities should undertake an assessment to identify areas sensitive to tall buildings is strongly supported when combined with Development Management A (1). This is an approach that previously worked effectively in the 2010s but was discouraged by the GLA.

⁵ FT 16/01/25 [Citigroup racks up £1bn bill for Canary Wharf tower refit](#)

Plan-making A(4) The proposal to define maximum heights in Local Plans is strongly supported; this approach has failed when only defined in SPGs such as the Opportunity Area Planning Framework. For example, the VNEB OAPF set a general height limit of 150m but buildings up to 200m have been constructed and a recent proposal of 6 tall buildings up to 230m has recently received support.⁶ The absence of height maximums at clusters identified in the Local Plan has only fed speculation.

Development Management Part A (4) The list of criteria for development proposals over 30m is missing an assessment of microclimate (which is increasingly important with rapid climate change). It should also include a requirement that benchmarks in the WLCCA for embodied carbon are met, as are operational carbon benchmarks, and a comparator with the carbon emissions of alternative mid-rise buildings on the site should be provided in order to justify the carbon emissions for a tall building.

Part A (4) (xi) We support the principle for publicly accessible areas at the top of all Metropolitan tall buildings, and do not agree with the caveat “where this is considered appropriate by the LPA” – a number of these have been negotiated out by the LPA.

The demolition of tall buildings should require greater justification as per the Circular Economy policy.

2.56 The rationale for the policy is completely misguided. London’s global image is absolutely not one of tall buildings on the skyline, and its tall buildings are rather shocking to many visitors, particularly since this image is the ubiquitous image of new cities around the world. These clusters are not a valued part of London’s identity, but just a fact of life.

2.57 Should add other problems including social exclusion and unnecessary carbon emissions.

⁶ And is awaiting approval from the Mayor: Vauxhall Square in Lambeth 25/03113/EIAFUL

MBUL6 — High-quality design

The design policy does not adequately address Lifetime Neighbourhood principles: places for all stages of life, intergenerational living, community infrastructure, local identity and social cohesion. It does not identify the key needs of neighbourhoods appropriately and gives insufficient weight to concepts that start with people, communities and needs.

This policy is unsound for the following reasons: it is not

positively prepared: insufficient weight is given to lifetime neighbourhood concepts; the policy does not address intergenerational living, community infrastructure, local identity or social cohesion; it does not identify key neighbourhood needs.

justified: no evidence is presented that the design policy is the most appropriate strategy when considered against reasonable alternatives; alternatives such as design codes co-produced with communities, Lifetime Neighbourhood design principles, and protections for community spaces have not been assessed.

effective: no enforcement mechanism and no monitoring framework for design outcomes related to Lifetime Neighbourhoods; the policy provides no stronger protections against harmful estate infill, no requirement for community control or management of community spaces, no minimum expectation of community space ratio to homes, and no safeguards for intergenerational, multi-use spaces.

consistent with national policy: the NPPF supports good design and strong communities; the draft Plan is too weak to deliver Lifetime Neighbourhood outcomes.

Change required: Embed Lifetime Neighbourhood design principles. Require community co-production of design codes. Require protections for community spaces, including community control or management, a minimum community-space ratio to homes, and safeguards for intergenerational, multi-use spaces. Establish enforcement and monitoring for Lifetime Neighbourhood design outcomes.

MBUL8 — Inclusive design

The current text focuses largely on lift and evacuation-lift requirements and uses “should” widely rather than mandatory wording ‘must’. It does not adequately address the full range of inclusive design needs — convenient and welcoming environments with no disabling barriers, and independent and safe access and egress without additional undue effort or separation — nor the needs of all protected groups, including disabled people, older people, children and young people, and people with young children. It also fails to address all stages of life, intergenerational living and community cohesion.

This policy is unsound for the following reasons: it is not

positively prepared: the policy is too narrow, centred on lifts and evacuation lifts; it does not address the full range of inclusive design needs or the needs of all protected groups; it does not adequately address all stages of life, intergenerational living and community cohesion; it does not identify the key needs of neighbourhoods appropriately.

justified: the policy is not supported by proportionate evidence on the barriers faced by disabled and older Londoners; no assessment of alternatives has been made, including broadening inclusive design beyond evacuation lifts, converting “should” to “must” where outcomes are essential, requiring enforcement, and adopting Lifetime Neighbourhood design, intergenerational spaces and community-led design.

effective: no enforcement mechanism; “should” is used rather than “must” where outcomes are essential; no monitoring framework for inclusive design outcomes.

consistent with national policy: the NPPF supports inclusive and accessible design; the Equality Act 2010 requires reasonable adjustments and accessible environments; the policy is too weak to meet these duties.

Change required: Broaden inclusive design beyond evacuation lifts: ensure buildings and public realm deliver “convenient and welcoming” environments with no disabling barriers, and independent and safe access and egress without additional undue effort or separation. Require intergenerational and multi-use spaces and address all stages of life and community cohesion. Convert “should” statements to mandatory requirements where outcomes are essential. Require enforcement mechanisms and establish monitoring of inclusive design outcomes, including equalities impacts.

MBUL9 — Healthy Streets and public realm

The policy needs stronger strategic commitments to long-term maintenance, enforcement and cumulative impact assessments, rather than delegating these to boroughs. It does not adequately address equalities impacts — who benefits from public realm improvements, who is displaced and who is excluded — nor the needs of women and girls, disabled people, older people and other protected groups. It also fails to address Lifetime Neighbourhood principles: local identity, community spaces, intergenerational living and social cohesion.

This policy is unsound for the following reasons: it is not

positively prepared: insufficient weight is given to lifetime neighbourhood concepts; the policy does not address local identity, community spaces, intergenerational living or social cohesion; it does not identify the key needs of neighbourhoods appropriately; it lacks strategic commitments to long-term maintenance and enforcement; it does not address who benefits, who is displaced or who is excluded.

justified: no evidence is presented that the policy is the most appropriate strategy when considered against reasonable alternatives, and no evidence is presented on the cumulative equalities impacts of public realm changes; alternatives such as community-led public realm design, Lifetime Neighbourhood principles, protections for community spaces, stronger strategic commitments, enforcement mechanisms and equalities impact assessments have not been assessed.

effective: no delivery mechanism for long-term maintenance; no enforcement mechanism; no monitoring framework for equalities impacts or for public realm outcomes related to Lifetime Neighbourhoods; responsibilities are delegated to boroughs without strategic support; the policy provides no stronger protections against harmful estate infill, no requirement for community control or management of community spaces, no minimum expectation of community space ratio to homes, and no safeguards for intergenerational, multi-use spaces.

consistent with national policy: the NPPF supports healthy communities and inclusive public realm, and the Equality Act 2010 requires accessible public realm; the Draft Plan is too weak to meet these duties or to deliver Lifetime Neighbourhood outcomes.

Change required: Strengthen strategic commitments to long-term maintenance and provide the strategic support boroughs need. Require enforcement mechanisms. Require cumulative impact assessments, including equalities impacts, covering who benefits, who is displaced and who is excluded. Address the needs of women and girls, disabled people, older people and other protected groups in the design and management of public realm. Require community control or management of community spaces. Set

minimum community-space provision per number of residential units. Safeguard intergenerational, multi-use spaces.